

ANSWER:

Westinghouse may have become aware of Saranac studies through published material but has no present knowledge of having commissioned or participated in the studies performed by the Saranac Lake Laboratory relating to asbestos exposure.

36. When was Defendant first aware of reports of studies of the Trudeau Foundation at Saranac Lake, New York, entitled "Effects of the Inhalation of Asbestos Dust in the Lungs of Asbestos Workers" by A. J. Lanza, Assistant Medical Director published in the J. Public Health Report, Vol. 50, No. 1, dated January 4, 1935 ("Lanza Report")?

ANSWER:

Westinghouse cannot state exactly when it may have become aware of this study, which is related to asbestos manufacturers and the asbestos industry of which Westinghouse is not a member.

37. Please state whether the Defendant at any time has been a member of any "trade organization" or "trade association" composed by other manufacturers, miners, distributors, and/or sellers of asbestos-containing products and, if so, please identify the name and address of each such association or organization, the dates of membership, and the names of any publications issued or written by such association or organization.

ANSWER:

Westinghouse has never been a member of the "asbestos industry" as that term is commonly used in asbestos litigation and therefore, has not been a member of organizations of the "asbestos industry," including the Asbestos Textile Institute; National Insulation Manufacturers Association; National Insulation Contractors Association; National Mineral Wool Association; Asbestos Cement Products Group; Air Hygiene Committee of the Asbestos Textile Institute; Asbestos Information Association; Quebec Asbestos Mining Association.

Westinghouse states that at the present time, it has not identified any information indicating that it was a member of the Asbestos Research Council of