will specifically and credibly identify the Westinghouse product(s) alleged to have given off respirable asbestos fibers in his or her presence, Westinghouse will endeavor to answer this Interrogatory for such product(s), if any, to the extent Westinghouse reasonably can do so.

21. After releasing for sale, distribution or marketing the products listed in answer to Interrogatory No. 5, did Defendant conduct any tests (either on animals or humans) to determine potential health hazards involved in the use of said materials an/or products?

a) The names of the products tested and the dates of said tests;
b) The name, address, and job classification of each person and/or agency conducting said tests;
c) the results of said tests;
d) Whether, as a result of any tests conducted, any products were removed rom the market;
e) The names of all products removed from the market as a result of said tests.

ANSWER:

Westinghouse incorporates by reference its Preliminary Statement and General Objections. Westinghouse further objects to this Interrogatory as argumentative to the extent that it implies Westinghouse was under a duty to conduct tests "to determine potential health hazards involved in the use of" its products. Without waiving these objections, Westinghouse states that it conducted air sampling and other industrial hygiene measures at various times at various Westinghouse facilities. Upon identification of the Westinghouse products reasonably believed to be at issue in this case, Westinghouse will review these documents and supplement this answer.

22. Has Defendant ever conducted or caused to be conducted any studies concerning the effects of the inhalation of asbestos dust and/or fibers on workers or other persons applying, using and/or working around any of the asbestos products manufactured, sold, distributed and/or relabelled for distribution by you or your predecessor? If so, please state:

a) The dates and nature of such studies;
b) The names and addresses of persons conducting such studies;
c) The purpose of such studies;