

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI

PHILIP SCORDINO, ET AL

PLAINTIFFS

VERSUS

NO. 89-5139(3)

OWENS-CORNING FIBERGLAS
CORPORATION, ET AL

DEFENDANTS

DWIGHT COPELAND, ET AL

PLAINTIFFS

VERSUS

D.C. NO. 89-5142(3)

METROPOLITAN LIFE INSURANCE
COMPANY, ET AL

DEFENDANTS

AUG 31 1990

JOE W. Williams, JR. CLERK

By Y. Jones

NOTICE OF 30(b)(6) DEPOSITION OF WESTINGHOUSE ELECTRIC
CORPORATION AND 30(b)(5) DOCUMENT REQUEST OF
WESTINGHOUSE ELECTRIC CORPORATION

TO: .ALL COUNSEL OF RECORD
(See Attached Service List)

PLEASE TAKE NOTICE that the plaintiffs, by and through their undersigned attorney of record, will take the 30(b)(6) deposition of WESTINGHOUSE ELECTRIC CORPORATION at 10:00 a.m. on September 5th and 6th, 1990, at the Law Offices of Bryant, Colingo, Williams & Clark, 718 Delmas Avenue, Pascagoula, MS before a Court Reporter. WESTINGHOUSE ELECTRIC CORPORATION is requested to designate witnesses who can best testify on the following subject matter on which examination will take place:

1. The corporate history and purpose of Westinghouse Electric Corporation including the history and purpose of all parent and subsidiary corporations.
2. The corporate structure of Westinghouse Electric Corporation
3. The medical research division of Westinghouse Electric Corporation.
4. The product development division of Westinghouse Electric Corporation.
5. The safety division of Westinghouse Electric

Corporation, its history and all files contained with or relating to such division. You are requested to bring all such files with you.

6. The corporate history, corporate purpose, manufacturing history, and product history of Westinghouse Electric Corporation, together with any product development performed by Westinghouse Electric Corporation and product safety research and development performed by Westinghouse Electric Corporation concerning asbestos-containing products, their use and accompanying warnings. You are requested to bring all relevant documents including but not limited to the following:

- (a) Product brochures related to asbestos-containing products;
- (b) Patents related to asbestos-containing products and substitutes for such products;
- (c) Instructions and warnings which were designed for asbestos-containing products whether accompanying such products or not;
- (d) All orders, shipping documents, and inventories for asbestos-containing products manufactured or sold by Westinghouse Electric Corporation;
- (e) All production records for asbestos-containing products manufactured or sold by Westinghouse Electric Corporation; and
- (f) Copies of all documents which relate to research performed by Westinghouse Electric Corporation relating to asbestos-containing products.

7. All literature concerning asbestos-containing products which you received from any other source including, but not limited to documents from other manufacturers and suppliers. You are requested to bring all such documents.

8. Copies of all in-house memoranda or other in-house documents relating to asbestos-containing products. You are requested to bring all such documents.

9. Copies of all in-house correspondence or other in-house

documents relating to asbestos-containing products. You are requested to bring all such documents.

10. Copies of all documents relating to the sale of asbestos-containing products to U.S. Plywood Corporation including, but not limited to, sales agreements, purchase orders, invoices, and inventories.

11. Copies of all documents relating to the sale of asbestos-containing products to Hopeman Brothers, Inc. including, but not limited to, sales agreements, purchase orders, invoices, and inventories.

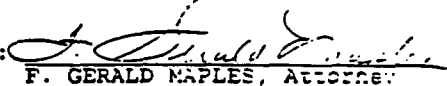
12. Copies of all documents relating to the sale of asbestos-containing products to Wayne Manufacturing Company including, but not limited to, sales agreements, purchase orders, invoices, and inventories.

13. Contracts with Ingalls Shipbuilding in Pascagoula, Mississippi. You are requested to provide copies of such contracts.

14. The present financial worth of Westinghouse Electric Corporation.

Respectfully submitted,

PHILIP SCORDINO, ET AL
DWIGHT COPELAND, ET AL,
Plaintiffs

By: 
F. GERALD MAPLES, Attorney
for the Plaintiffs

MAPLES & LOMAX, P.A.
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Telephone: (601) 762-3161

CERTIFICATE OF SERVICE

I, F. Gerald Maples, do hereby certify that I have mailed this day, first class, postage prepaid, a true and correct copy of the above and foregoing Notice of 30(b)(6) Deposition of Westinghouse Electric Corporation and 30(b)(5) Document Request of Westinghouse Electric Corporation to the following counsel of record:

Hon. Walter G. Watkins, Jr.
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Post Office Box 22608
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Hon. Roy C. Williams
BRYANT, COLINGO, WILLIAMS
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Post Office Drawer H
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This, the 21 day of August, 1990.


F. GERALD MAPLES