Westinghouse also objects to this request as seeking patently irrelevant information not discoverable under any theory.

Without waiving its objections, Westinghouse responds: see response to Interrogatory 47.

49. Has Defendant obtained statement from any witnesses including the Plaintiffs? If so, please:

a) list each witness who has given a statement and the name, address, and job title of each person having custody of any such statement.

ANSWER:

Westinghouse incorporates by reference its Preliminary Statement and General Objections. Westinghouse further objects on the basis that this interrogatory seeks information protected by the attorney-client privilege and attorney work product doctrine. Without waiving these objections, Westinghouse states that such statements as Westinghouse may possess, if any, would have been furnished by Plaintiffs' counsel and therefore, Plaintiffs are already in possession of same.

50. Do you contend that the Plaintiff/Decedent improperly used those products listed in response to Interrogatory No. 5? If so, please set out in detail in what respect the product was improperly used.

ANSWER:

Westinghouse incorporates by reference its Preliminary Statement and General Objections. Westinghouse further objects to responding to this Interrogatory concerning any products not alleged to have contributed to the alleged injuries of plaintiff(s), on the grounds that the Interrogatory, as applied to Westinghouse, is overly broad and unduly burdensome and seeks information which is irrelevant and immaterial to these proceedings and is not reasonably calculated to lead to the discovery of admissible evidence. If a particular plaintiff will specifically and credibly identify the Westinghouse product(s) alleged to have