

source and according to broad categories such as general business records, financial records, engineering records, etc.

There is no single length of time for which Westinghouse records are retained. Sales orders are initially kept at the Westinghouse or WESCO office receiving the order. Once the order is filled and payment is received from the customer, the sales order is considered closed. After a one to three year period, closed orders are then sent to a Westinghouse records storage facility for retention. Sales orders are only retained for a limited period of time, generally for a period of less than ten years.

Beginning in approximately 1985, Westinghouse made an effort to identify those of the various Westinghouse divisions which it reasonably believed likely to have documents that could be relevant in asbestos personal injury cases. Documents were collected from these locations, copied and placed in a repository. The documents are now located in Pittsburgh, PA.

Upon identification of the type of product(s) which plaintiffs have reason to believe was manufactured by Westinghouse, and from which they may have been exposed to asbestos, Westinghouse can review the documents collected and other potential sources of information, if any, for relevant, responsive information. Following an appropriate review of responsive documents for privilege and proprietary information, Westinghouse will respond fully and fairly based upon the documents and information it is able to collect.

Further, since approximately 1933, Westinghouse has had a corporate industrial hygiene department. This department has been the largest, most central location at which information relating to a wide range of safety and health issues has been collected. Westinghouse does not oppose reasonable, focused discovery relating to corporate industrial hygiene issues.