



IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA

IN RE: ASBESTOS-RELATED LITIGATION) NO. WDCP-83-1

WESTINGHOUSE ELECTRIC CORPORATION'S
RESPONSES TO PLAINTIFFS' STANDARD
INTERROGATORIES TO ALL DEFENDANTS

Westinghouse Electric Corporation ("Westinghouse"), pursuant to Federal Rule of Civil Procedure 33 and paragraphs 17(d) and 18(d) of the Initial Pretrial Order Coordinating Proceedings filed in the Western District of North Carolina styled In Re: Asbestos Related Litigation, No. WDCP-83-1, responds to plaintiffs' interrogatories as follows:

GENERAL OBJECTION

Westinghouse is a broadly diversified corporation that currently employs approximately 112,000 people and manufactures in various countries some 7,500 basic products with approximately 300,000 variations of those products. Although Westinghouse is engaged principally in the manufacture, sale and service of equipment and components for the generation, transmission, utilization and control of electricity, its businesses also include a wide range of products and services that are unrelated to electrical manufacturing.

Many of the products that Westinghouse manufactures and sells are very complex and consist of hundreds or thousands of components. Many of the components, as well as materials, are supplied to Westinghouse by other companies. Westinghouse does not have records to identify the composition of each product from each of its suppliers. Similarly, Westinghouse does not know the

Exhibit "B"

member of organizations of the asbestos industry, including National Insulation Contractors Association or the Asbestos Information Association.

Westinghouse currently is, or has been a member of:

- (a) National Safety Council (charter member)
- (b) Industrial Health Foundation (1935-1984)
- (c) American Industrial Hygiene Foundation (1978-present)

Westinghouse objects to reviewing its records to identify organizations to which its employees (past or present) may have belonged over the past years. Furthermore, there is no central repository of such information. Individual Westinghouse health and safety professional employees have belonged to various professional, trade, industrial and safety, hygiene or health organizations and research foundations or organizations such as the American Industrial Hygiene Association, Health Physics Society, and the Society of Safety Engineers. Westinghouse's records do not include the dates individual memberships were commenced or terminated and who, if anyone, attended meetings.

75. Identify all persons attending on your behalf any meetings held by any trade organization listed in the Interrogatory stated above.

Answer to Interrogatory 75

See Westinghouse's response to Interrogatory 74.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF ALLEGHENY

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) SS:
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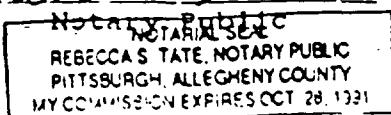
Before me, the undersigned authority, a Notary Public in and for said Commonwealth and County, personally appeared R. E. Peters, who, being duly sworn, deposes and says that he is ASSISTANT SECRETARY OF WESTINGHOUSE ELECTRIC CORPORATION, and that he signs the foregoing RESPONSES TO PLAINTIFFS' STANDARD INTERROGATORIES TO ALL DEFENDANTS AND SUPPLEMENTAL INTERROGATORIES on behalf of that defendant and is duly authorized so to do; that the matters stated in the foregoing document are not necessarily within the personal knowledge of deponent and that deponent is informed that there is no officer of WESTINGHOUSE ELECTRIC CORPORATION who has personal knowledge of all such matters; and that the facts stated in the foregoing document have been assembled by authorized employees and counsel of defendant and deponent is informed by those authorized employees that the facts stated in the foregoing document are true.

RE Peters

R. E. PETERS
Assistant Secretary

SWORN TO and subscribed
before me this 21st day
of August, 1989.

Rebecca S. Tate



By 

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the
was mailed first class, postage prepaid on

August 1989 to the following:

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