

endeavor to answer this Interrogatory for such product(s), if any, to the extent Westinghouse reasonably can do so.

10. Did Defendant ever have any division or subsidiary engaged in the contract business of applying asbestos-containing products? If so, please state:

- a) The name of each subdivision;**
- b) The full address of the home office and the date such subdivision or subsidiary was engaged in this contracting business; and**
- c) Whether said division or subsidiary conducted such business at ARMCO/A.K. Steel Middletown Plant and/or ARMCO/A.K. Steel Hamilton Plant, from 1954 to 1975? If so, please state:**
 - 1) The dates of such contracts;**
 - 2) The specific asbestos-containing products that were used in each contract.**

ANSWER:

Westinghouse understands plaintiff's reference to "contract business of applying asbestos-containing products", which the plaintiff has not defined, to refer to the contracting with others who install block and pipe insulation. So defined, the answer is no.

On November 1, 1983, Westinghouse purchased the assets, but not the stock, of Global Power Company and several affiliated entities. Westinghouse sold its interest in Global Power on February 13, 1987. Global was in the business of installing and repairing steam generation and power production equipment, and providing and installing replacement parts for steam generation and power production equipment, including boilers and steam turbines, and the prefabricated panels contained asbestos during the 1980's, when it had an interest in Global. Westinghouse likewise has no present information that indicates Global performed asbestos tear out during the time it had an ownership interest in Global.

In addition, Westinghouse had an ownership interest in the following companies during the specified periods of time:

**Gangloff Corporation (L.K.A. Heat Engineering, Inc.),
2/22/1980 until 2/13/1987
Senoyuit Corporation (L.K.A. Electric Arc, Inc.),
2/22/1980 until 2/13/1987**