

will specifically and credibly identify the Westinghouse product(s) alleged to have given off respirable asbestos fibers in his or her presence, Westinghouse will endeavor to answer this Interrogatory for such product(s), if any, to the extent Westinghouse reasonably can do so.

Without waiving its objections, Westinghouse states that it cannot reasonably confirm specific sales to specific customers or geographic regions from decades ago. Documents generated by various Westinghouse divisions and subsequently stored at a Westinghouse records facility are not maintained by customer or purchaser name, nor by product content. These documents are generally stored according to their source and according to broad categories such as general business records, financial records, engineering records, etc. Sales orders are initially kept at the Westinghouse 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 may be sent to a records facility for retention. Thereafter, sales orders are only retained for a limited period of time, generally for a period of less than ten years.

9. Did Defendant or any of Defendant's distributors, as listed in response to Interrogatory Nos. 8.1, 8.2, and/or 8.3 have sales representatives who specifically called on ARMCO/A.K. Steel Middletown Plant and/or ARMCO/A.K. Steel Hamilton Plant, from 1945 to 1975? If your response is yes, as to each facility, please state the following:

- a) The name and last known address of each such representative and whether they are still employed by Defendant;**
- b) The period of time they acted as your representative;**
- c) Their general responsibility as to each facility; and**
- d) Whether that person is still alive.**

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 given off respirable asbestos fibers in his or her presence, Westinghouse will