

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI

PHILIP SCORDINO, ET AL		PLAINTIFFS
VERSUS		NO. 89-5139(3)
OWENS-CORNING FIBERGLAS CORPORATION, ET AL		DEFENDANTS
	FILED FEB 25 1991	
DWIGHT COPELAND, ET AL	JOE W. MARTIN, JR. CLERK	PLAINTIFFS
VERSUS		NO. 89-5142(3)
METROPOLITAN LIFE INSURANCE COMPANY, ET AL		DEFENDANTS

WESTINGHOUSE ELECTRIC CORPORATION'S SUPPLEMENTAL RESPONSE TO PLAINTIFFS' INTERROGATORIES AND REQUEST FOR PRODUCTION TO DEFENDANTS IN PHASE I PROCEEDINGS

INTRODUCTION

Defendant, Westinghouse Electric Corporation ("Westinghouse"), by and through counsel, provides the following supplemental response to its June 15, 1990 Response to Plaintiffs' Interrogatories and Request for Production to Defendants in Phase I Proceedings.

WESTINGHOUSE'S GENERAL OBJECTION

Westinghouse is a broadly diversified corporation that currently employs approximately 119,000 people and manufactures in various countries some 7,500 basic products with approximately 100,000 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.

Answer

Not applicable.

45. Did your company or its predecessor(s) ever place any warnings directly on any of its asbestos containing products itself, as opposed to the package?

Answer

Westinghouse placed a warning on fire retardant micarta.

46. Did your company ever place in any form of the name of the company, its initials, or any identifying logo on any of its asbestos containing products itself, as opposed to the package?

Answer

Yes. See response to Interrogatory 17.

47. Did the warning inquired about Interrogatory Nos. 45 and 46, or similar warning, ever appear in any of your sales literature? If so, attach copies of such sales literature, showing the date such literature was printed.

Answer

No.

48. On what date was the sales literature inquired about in Interrogatory No. 47 first provided to distributors or sellers of your company's products, or your predecessor(s)' products?

Answer

Not applicable.

49. Has your company, or your predecessors(s), ever devised a high temperature heat insulation which does not contain asbestos? If so, state the date that such insulation was first placed on the market.

Answer

Not applicable.

50. Were any material safety data sheets ever prepared by your company or its predecessor(s)? If so, attach copies.

CERTIFICATE OF SERVICE

I, ROY C. WILLIAMS, do hereby certify that I have this day mailed, by United States Mail postage prepaid, a true and correct copy of the above and foregoing document to all counsel of record.

THIS the 28th day of February, 1991.

R. Williams
ROY C. WILLIAMS