

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

42. Has sales material been prepared by Defendant or its agents for purposes of marketing or advertising the asbestos products listed in answer to Interrogatory No. 5? If so, please state:

- a) The name and address of each person or entity who prepared same;**
- b) The name, address and job title of each person who presently has possession of same;**
- c) The date same was prepared;**
- d) The media used to disseminate the sales material.**

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

In addition, Westinghouse does not maintain its documents on the basis of products or the asbestos content of products. Therefore, Westinghouse would have to review every document maintained from its various divisions to identify the