40. Please state whether, prior to 1975, the defendant sponsored, or attended any meeting, seminar, conference, convention or legislative hearing where the subject of occupational health and exposure to asbestos was discussed and, if so, please state the date and place of such meeting and the name and address of any speakers or participants.

ANSWER:

Westinghouse incorporates by reference its Preliminary Statement and General Objections. Without waiving its objections, Westinghouse incorporates its response to Interrogatory 37, and further objects that it would be an unreasonable burden upon Westinghouse to review its records to determine which, if any, of its thousands of employees attended any meetings, conferences, conventions, etc. There is no central repository for such records.

41. As to each product listed in response to Interrogatory No. 5, please state whether Defendant, at any time, published and/or distributed any printed materials, including but not limited to brochures, pamphlets, catalogs, packagings or other written materials of any kind or character that contain any warnings, cautions, caveats or directions concerning the possible health effects of the products on a person. If so, please state as to each product:

a) The name of each relevant product;
b) The wording of each such warning;
c) A description of each such printed material;
d) The method used to distribute the warning to persons who are likely to use the products;
e) The date each such warning was issued;
f) Whether any warning accompanied any of your asbestos-containing products' sales literature, handout or pamphlets;
g) Please attach a copy of the warning and date said warning was issued;
h) The name, address, and job classification of each person who presently has possession of the above-described documents;
i) The name or names and addresses of the company who provided, produced, or manufactured the boxes or containers on which the warning appeared and dates these boxes with the warnings appeared.

ANSWER: