

- d) List all journals subscribed to by you concerning asbestos, industrial hygiene, medicine, safety, and/or engineering;
- e) List all books and articles dealing with asbestos and asbestos-related diseases and the date acquired.

ANSWER:

Westinghouse incorporates by reference its Preliminary Statement and General Objections. Westinghouse further objects to this Interrogatory, as applied to Westinghouse, on the grounds that it is subject to various interpretations, the primary one being that it presupposes that Westinghouse is a member of the "asbestos industry" (i.e., an asbestos mining or bulk insulation manufacturing operation).

By way of further response, and without waiving its objections, Westinghouse states that it does not maintain a single, central library. Westinghouse states that it maintains general reference materials and technical libraries throughout the corporation, which may include various industry periodicals, occupational health and medicine periodicals and other topical reference materials. There is no central indexing system that contains all of the information requested by this interrogatory for all departments within the corporation. Westinghouse's Industrial Hygiene Department would have been the most likely source of documents containing such information, if any. Westinghouse opposes unfocused production of documents from this department. However, Westinghouse will make available, in response to specific requests targeted to issues relevant in this case, certain specific documents collected from its Industrial Hygiene Department.

Westinghouse states that as a member of the National Safety Council and Industrial Health Foundation, Westinghouse probably would have received the publications of those organizations routinely distributed to members of those organizations. Information regarding these publications should be sought from the organizations themselves and not from Westinghouse.

35. Did Defendant in the 1920's or 1930's commission, or participate in the arrangements with Metropolitan Life Insurance Company for studies at the Trudeau Foundation at Saranac Lake, New York, concerning the effect of inhalation or ingestion of asbestos fibers upon human and/or animal bodies.