Westinghouse objects to and cannot answer this Interrogatory in the categorical manner in which it is phrased. Without waiving its objections, Westinghouse states that it has learned that mere exposure to asbestos, without more, does not constitute a health risk. Westinghouse generally has learned that inhalation of certain types and quantities of asbestos fibers over certain periods of time is associated with increased health risks for some people. The specifics of exactly how or when Westinghouse personnel acquired such knowledge or awareness is not presently known, but it is believed to have been by the 1940's. It is probable that it came from reading government publications or other public written materials.

26. Please state when Defendant first became aware of the possible association between inhalation of asbestos dust and/or fibers and the contraction of asbestosis and cancers including, but not limited to gastrointestinal cancer, laryngeal cancer, renal cancer, lymphoma, lung cancer and mesothelioma. As to each disease or condition, please state the source of that information, including a description of all tests conducted relative to the possibility of such a relationship.

ANSWER:

See answer to Interrogatory 25.

27. Please identify all physicians, industrial hygienists, and other employees (including their names and addresses) who were employed, retained or otherwise engaged by Defendant for research, investigation or study concerning asbestos or asbestos-related diseases.

ANSWER:

Westinghouse incorporates by reference its Preliminary Statement and General Objections. Westinghouse has had an Industrial Hygiene Department since the early 1930's. A number of industrial hygienists have been employed within the Department since its inception. Records have not been found or are no longer available which would indicate the names and addresses of all such employees.

The following persons are known to have been employed in the Industrial Hygiene Department:

H.W. Speicher (deceased)
G. Stewart