

Interrogatory for any products not claimed to have contributed to the alleged injuries of the Plaintiffs.

Without waiving its objections, Westinghouse states that upon information and belief, it has never rebranded any product for sale. Westinghouse further states that many of its products were sold to distributors. If the plaintiffs will identify the distributors, Westinghouse will investigate any distribution arrangements it may have had with those entities.

14. What is the name, address and job title of each individual who participated in the design and preparation of manufacturing specifications for each such products listed above in answer to Interrogatory No. 5?

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.

15. As to each product listed in response to Interrogatory No. 5, please describe how each product was to be cut, shaped, scribed, mixed and applied on the job. (In answering this question, give particular reference as to whether or not the materials were to be sawed or cut on the job, blown into confined areas, mixed with water in a cement or paste.)

ANSWER:

Westinghouse incorporates by reference its Preliminary Statement and General Objections. Westinghouse further objects to responding to this