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PLAINTIFF'S EXHIBIT
UC-816B

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Reply to:

FAIRFIELD

November 30, 1992

Angelo Cifaldi, Esq.
WILENTZ, GOLDMAN & SPITZER
90 Woodbridge Center Drive
Woodbridge, NJ 07095

RE: UNION CARBIDE DISCOVERY

Dear Angelo:

Enclosed herein please find a copy of Union Carbide's Answers to the Middlesex County Standard Interrogatories. Please review same and advise me whether there is additional information which you seek.

Very truly yours,

ARTHUR D. BROMBERG

ADB/mfo
Enclosure

P-UCAR-311

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UNION CARBIDE CHEMICALS AND PLASTICS COMPANY, INC'S RESPONSES TO MIDDLESEX COUNTY FORM B STANDARD INTERROGATORIES

Defendant Union Carbide Chemicals and Plastics Company, Inc., ("Union Carbide") responds as follows to plaintiffs' Interrogatories.

GENERAL OBJECTIONS

Union Carbide objects to the entire set of Interrogatories on the following grounds, which are hereby incorporated by reference in Union Carbide's responses to individual interrogatories below:

1. Union Carbide states that trial preparation and factual investigation are ongoing. Union Carbide's answers to these interrogatories are based on information known to Union Carbide at this time. Union Carbide reserves the right, however to make reference at the trial or at any hearing in this action to facts and documents not identified in these responses, the existence or relevance of which is later discovered by it or its counsel. By this reservation, Union Carbide does not in any way assume a continuing responsibility to update its responses to these interrogatories, and specifically objects to each of these interrogatories to the extent that they seek to impose any such continuing obligation upon Union Carbide.

2. Union Carbide also objects to all interrogatories

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insofar as they would require the disclosure of information protected by the attorney-client privilege or the work product doctrine.

3. Union Carbide objects to the plaintiffs' set of interrogatories in its entirety on the grounds that it is not reasonably framed in terms of the facts and subject matter of the present action, with the result that Union Carbide is called upon to speculate as to what information relevant to the present case, if any, may be deemed to fall within the scope of the interrogatories as phrased.

4. Union Carbide objects to any request to provide information about any asbestos-containing product which it has manufactured, sold or distributed, on the grounds that the asbestos fiber in those products was encapsulated by or embedded in other material and on the grounds that the plaintiff has not alleged exposure to those products. See Union Carbide's response to interrogatory no. B14 for a list and description of those products. From 1963 until June 30, 1985, Union Carbide mined and sold short fiber chrysotile asbestos initially as "Union Carbide Asbestos" and then under the trade name Calidria (some distributors marketed Calidria under other trade names). Calidria was marketed in both pellet and fibrous form and was used in products or production processes as a filler, reinforcer, opacifier, thixotrope (thickener) and the like. Calidria asbestos was not suited and could not be marketed for use as heat or frost insulation due to its quality and composition, in particular, the short length of its

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fiber. All responses to these interrogatories refer only to Calidria asbestos unless otherwise expressly noted.

5. Union Carbide objects to this entire set of interrogatories to the extent that it calls for information about Union Carbide employees or premises, or policies pertaining to Union Carbide employees or premises. Inasmuch as the plaintiffs do not allege that they or their decedents were ever employed by Union Carbide or worked at any job site controlled by Union Carbide, such information is irrelevant and immaterial to matters at issue in this case.

INTERROGATORY NO. A.1:

Where is defendant's corporate headquarters located?

RESPONSE TO INTERROGATORY NO. A.1:

Union Carbide's corporate headquarters is located at 39 Old Ridgebury Road, Danbury, Connecticut 06817.

INTERROGATORY NO. A.2:

Set forth the state in which defendant is incorporated in and the date of its incorporation there.

RESPONSE TO INTERROGATORY NO. A.2:

Union Carbide Corporation was first incorporated in the State of New York on November 11, 1917 under the name of Union Carbide and Carbon Products. Union Carbide changed its name to Union Carbide Corporation in 1957 and on July 3, 1989, to Union Carbide Chemicals & Plastics Co., Inc. [Union Carbide], which is wholly owned by the Union Carbide Corporation incorporated in Delaware.

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INTERROGATORY NO. A.3:

Has defendant ever been incorporated under the laws of the State of New Jersey? If so, set forth the inclusive dates the defendant was incorporated here.

RESPONSE TO INTERROGATORY NO. A.3:

No; see also Union Carbide's response to interrogatory no. A.2.

INTERROGATORY NO. A.4:

Has defendant ever maintained an office in the State of New Jersey? If so, indicate where this office was located and set forth the inclusive dates of its operation here and describe what function it served. In addition, set forth names, addresses and job positions of the individuals who staffed the office.

a. Describe the type of business defendant did in New Jersey.

RESPONSE TO INTERROGATORY NO. A.4:

See general objection 4. Union Carbide further objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, vague and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Union Carbide has owned and operated several manufacturing and research and development facilities in New Jersey. At some of the facilities, Union Carbide conducted research with asbestos and manufactured products containing asbestos. Union Carbide produced Bakelite at its Bound Brook, New Jersey facility and manufactured

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the steel scarfer machine at its former Piscataway, New Jersey facility (see Union Carbide's response to interrogatory B.14 for a product description). Except for limited experiments, however, none of the facilities used, processed or sold Union Carbide's Calidria asbestos.

INTERROGATORY NO. A.5:

Does defendant have an agent or representative in New Jersey who is authorized to accept service of process on its behalf? If so, identify each such agent or representative, indicate their respective addresses and set forth the dates during which this function is or was performed.

RESPONSE TO INTERROGATORY NO. A.5:

Yes. Union Carbide's agent in the state of New Jersey is CT Corporation, 28 W. State Street, Trenton, New Jersey 08608.

INTERROGATORY NO. A.6:

Has defendant ever had an agent or representative in New Jersey who was authorized to accept service of process on its behalf? If so, identify each such agent or representative, indicate what their respective addresses were and set forth the dates during which this function was performed.

RESPONSE TO INTERROGATORY NO. A.5:

See Union Carbide's response to interrogatory no. A.5.

INTERROGATORY NO. A.7:

State the name and address of defendant's corporate officers and indicate the respective offices they hold.

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RESPONSE TO INTERROGATORY NO. A.7:

Union Carbide objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

The Officers of Union Carbide are:

Robert D. Kennedy	Chairman of the Board and Chief Executive Officer
H. William Lichtenberger	President and Chief Operating Officer
Edgar G. Hotard	Vice President
Robert P. Krass	Vice President
John A. Clerico	Vice President and Treasurer and Chief Financial Officer
Joseph E. Geoghan	Vice President, General Counsel and Secretary
William H. Joyce	Vice President
John R. MacLean	Vice President
Gilbert E. Playford	Vice President
O. Jules Romary	Vice President
Cornelius C. Smith, Jr.	Vice President
Robert V. Welty	Vice President
John K. Wulff	Vice President, Controller and Principal Accounting Officer
John Macdonald	Assistant Corporate Secretary

The above officers have offices at Union Carbide's Corporate headquarters: 39 Old Ridgebury Road, Danbury, CT.

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INTERROGATORY NO. A.8:

Has defendant ever done business in the State of New Jersey.

RESPONSE TO INTERROGATORY NO. A.8:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Yes, for many years Union Carbide has done business in New Jersey (see Union Carbide's response to A.2). Union Carbide will respond specifically to requests about particular years.

INTERROGATORY NO. A.9:

If the answer to the previous interrogatory is in the affirmative, state:

a. The inclusive dates the defendant did do business in the State of New Jersey; and

b. Where in New Jersey it did business.

RESPONSE TO INTERROGATORY NO. A.9:

See general objection 4 and 5. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

See Union Carbide's response to interrogatory no. A.4.

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INTERROGATORY NO. A. 10:

Set forth the following information about each entity supplied in your answer to Interrogatory B4:

a. The State or County of each entity's incorporation; and

b. The corporate business headquarters of each entity from the date it was established until the present.

RESPONSE TO INTERROGATORY NO. A. 10:

See Union Carbide's response to interrogatory no. B.4.

a. New York.

b. 39 Old Ridgebury Road

Danbury, CT 06817

INTERROGATORY NO. B.1:

State the name, address and job position of each and every individual signing these interrogatories on behalf of the defendant.

a. State the name, address and employer and job position of each person, whether defendant's employees or otherwise who was consulted with or who assisted in the answering of these interrogatories.

RESPONSE TO INTERROGATORY NO. B.1:

Union Carbide objects to this interrogatory as vague and ambiguous. Subject to its objections, Union Carbide responds as follows: The responses to these interrogatories were prepared by counsel for Union Carbide Corporation based on information either contained in business records or provided by present and former

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Union Carbide employees. In particular, John L. Myers, former Product and Production Manager for asbestos (Calidria) has provided much information. Sales and other business records used to respond to these interrogatories are under the control of Ms. Karen Carl, Custodian of Records, Kelley Drye & Warren, Six Stamford Forum, Stamford, CT 06901.

John Macdonald, Assistant Corporate Secretary, verified these responses on behalf of Union Carbide Corporation. His office is at Union Carbide Chemicals and Plastics Company, Inc., 39 Old Ridgebury Road, Danbury, CT 06817

INTERROGATORY NO. B.2:

Give a full and detailed description of the nature of the business that your company is engaged in.

RESPONSE TO INTERROGATORY NO. B.2:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Union Carbide Corporation is among the nation's major industrial companies. Its major lines of business include chemicals and plastics, industrial gases and carbon products. Below is a breakdown of the detailed description of the nature of the business that the company is engaged in:

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Business Group	Businesses	Product
Chemicals & Plastics	Industrial Chemicals	Ethylene Oxide/Derivatives Glycol Ethylene Oxide Polycrystalline Silicon Crystal Products
	Polyolefins	Polyethylene Polypropylene Specialty Polyolefins Fabricated Plastic Products UNIPOL Licensing UNISON Transformer Services
	Solvents & Coatings	Alcohols Glycol Ethers Ketones Esters Coating Resins Latexes Vinyl Acetate and Acrylic Monomers Electronic Processing
Materials	Specialty Chemicals	Specialty Chemical Products Biocides Solvents Water Soluble Polymers Silicones Polyester Modifiers Urethane Foam Intermediates Hydraulic Fluids Synthetic Lubricants Catalysts Gas Treating Systems Adsorbents Molecular Sieves Process Systems Ethylidene Norborene
	International Petro-chemicals	Markets internationally a variety of chemicals and plastics produced by Union Carbide and others.

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Business Group	Businesses	Product
Industrial Gases Gases	Industrial	Oxygen
	Nitrogen	
	Argon	
	Acetylene	
	Hydrogen	
	Helium	
	Specialty Gases	
	Coatings Service	
	Energy Systems and Services	
	Membrane Systems	
	Advanced Ceramics	
Carbon Products	Electrode Systems	Graphite Electrodes
	Carbon Products	Carbon Electrodes
	Graphite Specialties	Refractories
	Specialty Products	Anodes, Specialty Graphite Flexible Graphite

INTERROGATORY NO. B.3:

When did your company commence its business?

RESPONSE TO INTERROGATORY NO. B.3:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, vague and ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Union Carbide was originally incorporated as Union Carbide & Carbon Products on November 11, 1917.

INTERROGATORY NO. B.4:

a. Are or have any of defendant's predecessors,

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affiliates, subsidiaries, or parent corporations engaged in the mining, sale and distribution of asbestos and/or asbestos fiber and/or asbestos containing insulation products? If so, state the name of each such entity, describe the nature of the involvement that each entity has or has had in the mining, distribution or sale of these products and materials, and set forth the inclusive dates each was involved in each aspect of this business.

b. As to each such entity referred to in (a) above, state:

1. The relationship between defendant and each such entity;

2. The date each such relationship began and terminated;

3. The names and addresses of each such entity's corporate officers and Board of Directors; and

4. The names and addresses of your corporate officers and Board of Directors.

RESPONSE TO INTERROGATORY NO. B.4:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

See Union Carbide's response to B14.

a,b1,b2) The following divisions or subsidiaries of Union Carbide operated the Calidria business during the course of its

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existence:

Corporate Divisions of Calidria (1963-1985)

(1963-1965)	Nuclear Division
(1965-1967)	Mining and Metals Division
(1967-1970)	Chemicals and Plastic Division
(1970-1984)	Mining and Metals Division
(1984-1985)	UMETCO, a wholly owned subsidiary of Union Carbide, through Calidria Corporation, a wholly owned subsidiary of UMETCO.

In 1976 Union Carbide acquired another company which prior to its acquisition by Union Carbide had manufactured a line of mastic sealants, coatings and adhesives, some of which contained small quantities of asbestos. The asbestos fiber in those products was encapsulated by binder ingredients in the production process. The company sold the division which produced these products and ceased producing all asbestos containing products (except for TRE-HOLD, a tree sprout inhibitor (see Union Carbide's response to interrogatory no. B14)) prior to Union Carbide's acquisition of the company.

Union Carbide also acquired other companies which prior to Union Carbide's acquisition may have sold a limited line of asbestos products such as asbestos gloves and other asbestos special products.

b3,b4) See Union Carbide's response to interrogatory no. A. 7.

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INTERROGATORY NO. B.5:

From the year 1925 until the present, identify and state the address of any organization in which defendant, its officers, agents or employees have belonged, having anything to do with setting standards, regulations or the conducting of research into the use of asbestos, asbestos products or asbestos fiber.

RESPONSE TO INTERROGATORY NO. B.5:

See general objection 5. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Union Carbide was a member of the Industrial Health Foundation, the American Industrial Health Association and Asbestos Information Association/North America. Union Carbide may also have cooperated with work undertaken by the Pneumoconiosis Research Council of the United Kingdom, The Organization Resources Recovery Organization, and the Insulation Industry Hygiene Research Program. Union Carbide or Union Carbide personnel also participated in activities of the National Safety Council.

John Myers, former Product and Production Manager for asbestos (Calidria) was active in the AlA. Newton Ketchum and Paul McDaniel, retirees of Union Carbide Corp., participated in the Industrial Hygiene Foundation. Newell E. Bolton, presently an employee of Union Carbide Corp., participated in the American Industrial Hygiene Association, Messrs. John Nichol, Tom Gagner and

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Ray R. Renkin, Union Carbide employees, and Mr. Claude Eley, retired from Union Carbide Corp., participated in the National Safety Council.

INTERROGATORY NO. B.6:

Has defendant ever been a member of or affiliated with any trade groups, professional associations or organization? If so, identify each such group, association or organization and set forth the inclusive dates of defendant's membership in each.

RESPONSE TO INTERROGATORY NO. B.6:

See Union Carbide's response to interrogatory no. B.5.

INTERROGATORY NO. B.7:

Has defendant ever been a member of or affiliated with the Asbestos Textile Institute? If so, indicate when your company was affiliated or was a member of this organization.

RESPONSE TO INTERROGATORY NO. B.7:

See Union Carbide's response to interrogatory no. B.5.

INTERROGATORY NO. B.8:

Does your company publish or distribute a manual or booklet which describes the nature of the business that defendant is engaged in? If so, set forth the title of such manual or booklet, indicate when it was published and attach a copy of same hereto.

RESPONSE TO INTERROGATORY NO. B.8:

Yes, Union Carbide's Annual Report; a copy of the most recent report is attached as Exhibit "A".

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INTERROGATORY NO. B.9:

Has any employee or representative of your corporation ever attended a conference or meeting of the Asbestos Textile Institute? If so, identify each such individual who attended these conferences or meetings and set forth the dates on which each such individual went to such a conference or meeting.

RESPONSE TO INTERROGATORY NO. B.9:

See Union Carbide's response to interrogatory no. B.5.

INTERROGATORY NO. B.10:

Has your company ever been a member of, been affiliated with or provided funding for the Industrial Hygiene Foundation? If so, indicate when your company was a member or affiliate of this organization and set forth the dates, if applicable, when you provided funding to this organization.

RESPONSE TO INTERROGATORY NO. B.10.:

See Union Carbide's response to interrogatory no. B.5.

INTERROGATORY NO. B.11:

Does your company have a Board of Directors?

RESPONSE TO INTERROGATORY NO. B.11:

Yes.

INTERROGATORY NO. B.12:

Does your company's Board of Directors conduct meetings?

RESPONSE TO INTERROGATORY NO. B.12:

Yes.

INTERROGATORY NO. B.13:

Have minutes of the Board of Directors meetings been taken

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and maintained by your company? If so, indicate who has custody of the minutes at this time.

RESPONSE TO INTERROGATORY NO. B.13:

Yes. Marcia Reifenheiser, Staff Assistant, Corporate Secretaries' Group, has custody of the Minutes of the Board of Directors meetings.

INTERROGATORY NO. B.14:

Has your company, and/or its subsidiaries or affiliates ever manufactured or distributed asbestos containing products?

RESPONSE TO INTERROGATORY NO. B.14:

See General Objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and is not reasonably limited by either time or subject matter to information that is relevant to the matters at issue in this case, and on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Prior to late 1979, Union Carbide or one of its subsidiaries produced a tree sprout inhibitor called TRE-HOLD, which was used primarily to inhibit growth on telephone poles. TRE-HOLD contained a small quantity of asbestos bound in an asphalt carrier; the asbestos in TRE-HOLD was fully encapsulated.

Prior to 1976, Union Carbide manufactured a product called Bakelite, which is a phenolic molding compound. Bakelite was marketed by Union Carbide through distributors for use in electronic parts and products such as switches, switch boxes,

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radios, and plug in receptacles. The asbestos fiber in the Bakelite material was fully encapsulated.

Prior to August 1977, Union Carbide manufactured UDEL Polysulfone P6050, which was an asbestos-containing, high temperature, high rigidity thermoplastic molding material, used primarily in camera cases. The asbestos in UDEL Polysulfone P6050 was fully encapsulated.

Union Carbide formerly manufactured automotive radiator products under the names Prestone Antifreeze, Prestone Sealer Stop Leak and Prestone Heavy Duty Sealer. Asbestos ceased to be used as an additive in the antifreeze in 1971 and in the sealers in 1972. The fiber in these products was embedded within a liquid substance.

Until 1985, Union Carbide sold or leased acetylene cylinders which contained asbestos liners. The asbestos in the acetylene cylinder liners was encapsulated within liner materials and the liner materials were contained within a metal cylinder.

Union Carbide also manufactured a steel "scarfer" machine (used to remove blemishes and imperfections from steel), with parts which contained some asbestos. In the late 1950's or early 1960's, Union Carbide may also have experimented with certain asbestos-containing polyethylene and polystyrene products which would have only been sold in limited quantities on an experimental basis.

Union Carbide no longer manufactures or sells any of the above products. Union Carbide has never manufactured or distributed an asbestos-containing cement, pipe covering, cloth or the like.

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From 1963 through June 30, 1985 Union Carbide mined and sold a unique short-fiber chrysotile asbestos initially as "Union Carbide Asbestos" and then under the trade name Calidria (some distributors marketed Calidria under other trade names). Calidria was sold, both directly by Union Carbide and through distributors as raw asbestos, in pelletized and fibrous form in varying grades of purity of content. Calidria was not sold to the general public or to "end users". It was sold to manufacturers for use in their products or production processes as a filler, reinforcer, opacifier, thixotrope (thickener) and the like. Calidria asbestos was not suitable for use as standard heat or frost insulation or, for instance, piping, due to its quality and composition, in particular, due to the short length of its fiber.

See also Union Carbide's response to interrogatory no. B.4 a.

INTERROGATORY NO. B.15:

Give a complete and detailed description of the particular qualities that asbestos has or had that caused your company and/or its subsidiary or affiliate to utilize asbestos in your products.

RESPONSE TO INTERROGATORY NO. B.15:

See general objection 4. Union Carbide also objects to this interrogatory on the ground that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Calindria was not an "asbestos containing product" but

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rather Calidria consisted of raw chrysotile asbestos in a unique short-fiber formulation which Union Carbide mined at or near King City, California. Calidria's chemical formula is $Mg_6(OH)_8Si_4O_{10}$. Union Carbide produced four grades of Calidria asbestos: standard, super standard, high purity, and resin grade; the different grades reflect varying degrees of purity of content. Each grade was sold in both pelletized and fibrous form. In appearance, Calidria is grey (pelletized) or white (fibrous) in color and powdery in substance. The following is a representative listing and description of the various brands of Calidria mined and marketed by Union Carbide:

PRODUCT SYMBOL	PRODUCT CODE	DESCRIPTION
HPO	651001	High Purity, Open Fiber
HPO-C	651101	High Purity, Open Fiber
HPP	651601	High Purity, Pellets
HPP-JAP	651701	High Purity, Pellets, 4-Ply bags
R-G 110	652101	Resin-Grade, Open Fiber 15% +325
R-G 110-D	652201	Resin-Grade, Open Fiber, 15% +325
R-G 144	652501	Resin-Grade, Open Fiber
A-14	652801	Resin-Grade, Open Fiber
R-G 244	653001	Resin-Grade, Open Fiber
R-G 444-0	653301	Resin-Grade, Open Fiber, 10% Stearic
A-28	653601	Resin-Grade, Open Fiber, Silica Treated
SG-100	654001	Standard Grade, Pellets
SG-102	654201	Standard Grade, Pellets, 100-lb. bags
SG-130	654501	Standard Grade, Open Fiber, 30% +325
SG-144	654801	Standard Grade, Open Fiber, 45% +325
SG-200	655001	Super Standard Grade, Pellets
SG-210	655301	Super Standard Grade, Open Fiber, 15% +325
SG-444-0	655501	Standard Grade, Open Fiber, 5% Stearic, Hydrophobic
T-135-0	656001	High Purity, Open Fiber, Titanated, 35%, Anatase
T-135-P	656301	High Purity, Pellets, Titanated, 35%, Anatase
CG-100	656601	Coatings Grade, Pellets
CG-135-0	656801	Coatings Grade, Open Fiber, Titanated 35%, Rutile

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PRODUCT SYMBOL	PRODUCT CODE	DESCRIPTION
CG-135-P	656901	Coatings Grade, Pellets, Titanated, 35%, Rutile
Super Visbestos	657301	Super Standard Grade, Cracked Pellets
Visbestos	657601	Standard Grade, Open Fiber
Oilbestos	657001	Standard Grade, Open Fiber, 5% Stearic, Hydrophobic

Calidria was not sold to the general public or to "end users". It was sold to manufacturers for use in their products or production processes as a filler, reinforcer, opacifier, thixotrope (thickener) and the like. Calidria asbestos was not suitable for use as standard heat or frost insulation or, for instance, piping, due to its quality and composition, in particular, due to the short length of its fiber.

The following is a representative list of different brands of Calidria asbestos and the applications for which they were marketed:

CALIDRIA PRODUCT	APPLICATIONS
SG-100	Vinyl-Asbestos Floor Tile
SG-130	Masonry Coatings
SG-200	Rubber Floor Tile
Super Vibestos	Drilling Muds
SG-210	Mastics Asphaltic Coatings
HPP	Rubber Sheet Goods Mineral Board (Japan) Paper (Japan)
HPO	Asphaltic Coatings, Adhesives

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CALIDRIA PRODUCT	APPLICATIONS
RG-110	Asphaltic Spray Coatings Aluminized Coatings Mastics, Caulks and Sealants
RG-144	Adhesives (Epoxy, Casim, Phenolics) Coatings Vinyl Plastisols (High Build, Dip Coatings) Mastics, Caulks and Sealants Vinyl, Butyl, Polysulfide, Bituminous)
RG-244	Polyester Resins (Laminating, Gel Coats, Putties) Caulks and Sealants (Vinyl, Butyl, Acrylic, Polyurethane) Coatings (Epoxy, Urethane, Asphaltic)

In addition to different markets in which the Calidria products listed above were respectively sold, other brands of Calidria may have been sold within the same markets.

INTERROGATORY NO. B.16:

Did any of the entities from whom you received asbestos fiber or any of the entities referred to in B6, B7, B9 and B10 ever inform you or your company's employees that asbestos was potentially hazardous to the health of individuals who were exposed to it?

RESPONSE TO INTERROGATORY NO. B.16:

See general objection 4 and 5. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Union Carbide's knowledge concerning potential health

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hazards possibly associated with excessive asbestos fiber inhalation developed gradually. Sources of information as to possible health concerns of which Union Carbide is presently aware included general and scientific literature on the topic and reports or memoranda by Union Carbide employees.

INTERROGATORY NO. B.17:

If so, for each such company that transmitted such information to you and your company, set forth the following information:

a. The name of each and every entity that informed your company that asbestos was potentially hazardous to health;

b. The dates you received this information from each such company;

c. Indicate how this information was transmitted to you;

d. The substance of each warning; and

e. Annex hereto copies of each such warning.

RESPONSE TO INTERROGATORY NO. B.17:

See Union Carbide's response to interrogatory no. B.16.

INTERROGATORY NO. B.18:

Has defendant distributed or sold asbestos or asbestos containing products in the State of New Jersey? If so, set forth the following information:

a. The date that defendant commenced selling asbestos or asbestos containing products in the State of New Jersey;

b. The date the defendant terminated the sale of asbestos or asbestos containing products in the State of New Jersey; and

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c. The areas of New Jersey where asbestos or asbestos containing products were sold.

RESPONSE TO INTERROGATORY NO. B.18:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Union Carbide possesses copies of invoices of Calidria sales made by Union Carbide to Calidria customers. Union Carbide also maintains a computer data base of such sales.

Since Union Carbide sold its Calidria business in 1985, Union Carbide, at present, can make no representation as to the completeness of its records. The aforementioned constitute the most complete records of Calidria sales currently available to Union Carbide. Union Carbide lacks, however, a record of sales made by Calidria distributors, who accounted for approximately 25% of all Calidria sales.

According to Union Carbide's records, there were sales of Calidria in the state of New Jersey. Upon plaintiff's request, Union Carbide will make its sales records available to the plaintiff for review and duplication at a suitable time and place.

INTERROGATORY NO. B.19:

Did defendant ever affix any warnings to any of the asbestos or asbestos containing products it marketed and distributed? If so for each such product that contained a warning

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set forth the following information:

a. The brand and tradename of each such product that contained a warning;

b. The date a warning was attached to each such product;

c. The substance of each warning; and

d. Annex hereto copies of each such warning.

RESPONSE TO INTERROGATORY NO. B.19:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Union Carbide had used two cautionary statements on its Calidria packaging: The first cautionary statement was used from June 22, 1968 through May 1972, and read as follows: "Warning: Breathing dust may be harmful. Do not breathe dust." The second cautionary statement was prescribed by OSHA in 1972 and was first printed on Calidria packaging in June of that year and was used by Union Carbide until the sale of the Calidria mine and mill in 1985; this second cautionary statement read as follows: "Caution. Contains asbestos fibers. Avoid creating dust. Breathing asbestos dust may cause serious bodily harm."

INTERROGATORY NO. B.20:

Set forth the name, address and job position of each and every individual who took part in your company's decision to place a warning on its asbestos or asbestos containing products.

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RESPONSE TO INTERROGATORY NO. B.20:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

See Union Carbide's response to interrogatory no. B.21.

INTERROGATORY NO. B.21:

Prior to 1964, did any employee of the defendant ever recommend that it utilize a warning on its asbestos containing products? If so, identify each such employee, indicate when he made such a recommendation, indicate what the recommendation was, to whom it was given and what action was taken thereon.

RESPONSE TO INTERROGATORY NO. B.21:

See general objections 4 and 5. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Union Carbide and its business personnel consulted various experts in the medical and industrial hygiene professions concerning precautions that should be followed by persons involved in the use or handling of Union Carbide's Calidria asbestos. During the early days of Union Carbide's Calidria business, industrial hygienists at Union Carbide issued asbestos toxicology reports which were distributed to sales and other appropriate

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personnel. The advice of the experts was incorporated, as appropriate, on Calidria warning labels and in the safety literature that Union Carbide made available and disseminated to its Calidria customers.

INTERROGATORY NO. B.22:

Has defendant ever established or maintained a library or libraries which in any way dealt with industrial hygiene, medicine, safety and engineering? If so, state:

a. Where the library was or is located;

b. The names of all journals which that library subscribed to;

c. For whom and for what purpose the library was established; and

d. Whether there is an inventory of the books and publications which are or were housed in this library, and if so, attach a copy hereto.

RESPONSE TO INTERROGATORY NO. B.22:

See general objection 4 and 5. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, oppressive and harassing, and on the grounds that it seeks information irrelevant and immaterial to the matters at issue in this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections Union Carbide responds as follows:

During the early 1960's, Union Carbide established and maintained a medical library. In December, 1981, the medical

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library merged into the general corporate library, located in Union Carbide's World Headquarters: Union Carbide Corporation; 39 Old Ridgebury Road; Danbury, Connecticut 06817. The chief librarian of the corporate library is Mr. Roger Miller. In 1983, Union Carbide's medical department organized its own library, located also in Union Carbide's World Headquarters, but apart from the corporate library. The medical library and a toxicology library is presently overseen by Mr. Marvin Huffman. Some medical-related material may also be kept at one or more of Union Carbide's "satellite" libraries located in several of its offices and facilities.

INTERROGATORY NO. B.23:

Did defendant or its agents or employees ever make any effort to keep abreast of medical literature concerning potential health hazards posed by the use of and/or exposure to asbestos? Indicate the name, addresses and job positions of all your company's employees who reviewed this literature.

RESPONSE TO INTERROGATORY NO. B.23:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, vague and not reasonably calculated to lead to the disocvery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Union Carbide's medical officers, industrial hygienists and other personnel kept abreast of issues relating to asbestos. See Union Carbide's responses to interrogatories B16, B21 and B22.

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Dr. Hilton Lewinsohn currently serves as Medical Director, Chemicals & Plastics Company, Inc. Dr Lewinsohn is a recognized expert in asbestos-related medical matters and pathologies.

INTERROGATORY NO. B.24:

Prior to 1964 had your company done any studies or tests or had your company participated in, been the subject of, or been aware of any studies or tests by others concerning the potential effects of inhalation of asbestos dust or fibers by one using or being exposed to asbestos or asbestos containing products. If so, state:

a. The date each study or test was conducted and the date defendant became aware of said study or test;

b. The names and addresses of the persons conducting each test or study;

c. The purpose of the study or test;

d. The results of each study or test; and

e. If reduced to writing attach a copy hereto.

RESPONSE TO INTERROGATORY NO. B.24:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

See Union Carbide's responses to interrogatories B.21 and 22. Union Carbide's knowledge concerning potential health hazards possibly associated with excessive asbestos fiber inhalation

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developed gradually. Sources of information as to possible health concerns of which Union Carbide is presently aware included general and scientific literature on the topic and reports or memoranda by Union Carbide employees. Upon plaintiff's request, copies of such reports and memoranda, which Union Carbide has located, will be made available at a suitable time and place for review and duplication by the plaintiff. Prior to 1964, Union Carbide did not conduct tests of its own. See Union Carbide's response to interrogatory no. B.26.

INTERROGATORY NO. B.25:

Prior to 1964, did defendant's agents or employees conduct any experiments with laboratory animals to determine whether or not its asbestos containing products were potentially hazardous to the health of workers who were using them? If so, for each such experiment which was conducted, indicate who conducted it, state when it was conducted and describe the results of each such experiment.

RESPONSE TO INTERROGATORY NO. B.25:

See general objection 4. Subject to its objections, Union Carbide responds as follows:

No, not prior to 1964. See Union Carbide's response to interrogatory no. B.26.

INTERROGATORY NO. B.26:

Since 1964 has your company done any studies or tests or has your company participated in, been the subject of, or been aware of any studies by others concerning the effects of inhalation

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of asbestos dust and fibers by one using or being exposed to asbestos or asbestos containing products? If so, state the following:

a. The date each such study or test was conducted and the date defendant became aware of said study or test;

b. The names and addresses of persons conducting the tests or studies;

c. The purpose of the tests;

d. The results of each test or study; and

e. Attach a copy of any reports based upon each study or test.

RESPONSE TO INTERROGATORY NO. B.26:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad and unduly burdensome. Subject to its objections, Union Carbide responds as follows:

See Union Carbide's responses to interrogatories B16, B21, B22 and B23. Two studies of Calidria asbestos were made by the Chemical Hygiene Fellowship of Mellon Institute on behalf of Union Carbide:

1. The first study was entitled "The Fibrogenic Potential of Asbestos Products - Via Intraperitoneal Injection In Guinea Pigs, Rats and Rabbits and by the Intratracheal Route in the Rat". Although Union Carbide cannot represent that it knows the names of the persons who conducted the study, the following

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individuals did sign the study: Edwin R. Kinkhead, B.S., Research Assistant, Urbano C. Pozzani, M.S., Senior Fellow and Charles P. Carpenter, Ph.D., Assistant Administrative Fellow. Also, the following persons received an acknowledgment in the study: Charles C. Hahn, B.S., Junior Fellow and John M. King, Ph.D., DVM, Fellow. The study was completed on July 8, 1966. The purpose of the study was to evaluate the degree of fibrogenicity of asbestos mined at Union Carbide's King City, California facility as compared with other forms of asbestos. A copy of the study's report will be supplied if requested.

2. The second study was entitled "Calidria Asbestos Resin Grade RG244, Tracheal Insufflation of Rat Lungs with Interpretation of Pathology After 20, 60, 90, and 180 Days". Although Union Carbide cannot represent that it knows the names of the persons who conducted the study, Charles P. Carpenter, Ph.D., Administrative Fellow, was the editor of the study's report. In addition, the following individuals were named as contributors to the study: D.L. Geary, Jr., E.R. Kinkhead, R.C. Myers and D.J. Nachreiner. The study was completed on September 3, 1971. The purpose of the study was to evaluate the degree of fibrogenicity of Union Carbide's RG244 as compared

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with other forms of asbestos. A copy of the study's report will be supplied if requested.

In addition to the above two tests, and in addition to chemical analyses of Calidria which Union Carbide may have undertaken, in the mid-1960's Union Carbide cooperated with the Pneumoconiosis Research Unit of the Llandough Hospital in the United Kingdom to conduct a "trace element analysis" of asbestos and provided samples of Calidria asbestos for such analysis. Union Carbide may also have conducted "patch tests" to determine the impact, if any, of Calidria on skin and other soft tissue. Union Carbide is currently endeavoring to locate reports of these tests.

INTERROGATORY NO. B.27:

Since 1964, has defendant or its agents or employees sponsored or performed any laboratory experiments with animals to determine whether or not its asbestos containing products were potentially hazardous to the health of workers who were using them? If so, state who conducted each study, indicate where each study was conducted, and describe what the results of each test were.

RESPONSE TO INTERROGATORY NO. B.27:

See general objection 4. Subject to its objections, Union Carbide responds as follows:

See Union Carbide's response to interrogatory no. B.26.

INTERROGATORY NO. B.28:

Prior to 1964, did defendant or its agents or employees ever go out to construction sites, factories or power bases where its asbestos or asbestos containing products were being used to determine or measure the levels of asbestos dust or fibers in the

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work environment? If so, for each such study or experiment that was conducted, set forth the following information:

a. When and where each measurement, study or test was conducted;

b. Who conducted each measurement, study or test:

c. What types of equipment were utilized to measure the levels of asbestos dust or fibers in the air;

d. What the results of each measurement, test or study were; and

e. Attach a copy of any reports concerning the measurements, tests or studies.

RESPONSE TO INTERROGATORY NO. B.28:

See general objection 4. Subject to its objections, Union Carbide responds as follows:

No, not prior to 1964. See Union Carbide's response to B.29.

INTERROGATORY NO. B.29:

Since 1964, has defendant and/or its agents or employees ever gone out to any construction sites, factories or power houses where its asbestos or asbestos containing products were being used to determine the levels of asbestos dust or fibers which were in the work environment? If so, for each such study or experiment which was conducted, set forth the following information:

a. Who conducted each measurement, study or test;

b. When and where each measurement, study or test was conducted;

c. What type of equipment was utilized to measure the

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levels of asbestos in the working environment;

d. What the results of each study, measurement or test were; and

e. Attach a copy of any report concerning each measurement, study or test.

RESPONSE TO INTERROGATORY NO. B.29:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Starting in 1972, Union Carbide offered to take dust counts of the premises of Calídria customers in order to help them maintain a safe working environment, a service which many Calidria customers utilized (Calidria was not sold to the general public or other "end-users", but rather was marketed only to manufacturers or producers who used Calidria in their products or production processes). Dr. Harry Rhodes, an industrial hygienist, supervised Union Carbide's dust monitoring program.

Upon plaintiff's request, Union Carbide will make copies of results of such dust counts available to the plaintiff for review and duplication at a suitable time and place.

INTERROGATORY NO. B.30:

Give a complete description of all programs implemented and precautions taken by the defendant at its plants and facilities where it manufactures asbestos or asbestos containing products to reduce the levels of asbestos dust and fibers in the air. Include

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in this description all programs implemented and precautions taken since each plant was in operation. Include in this answer the date that each precaution was taken or procedure was implemented.

RESPONSE TO INTERROGATORY NO. B.30:

See general objection 5.

INTERROGATORY NO. B.31:

Did defendant at any time require its employees who worked in the manufacture of asbestos or asbestos containing products to wear respirators, face masks or other protective devices? If so, set forth which employee (by type) was required to wear such protective devices, when the directive relative to same was issued for each type of employee and specify what type of device was to be worn by each type of employee.

RESPONSE TO INTERROGATORY NO. B.31:

See general objection 5.

INTERROGATORY NO. B.32:

Give a complete explanation of why each and every employee set forth in the preceding answer was required to wear a respirator, face mask or other protective device while working with asbestos.

RESPONSE TO INTERROGATORY NO. B.32:

See general objection 5.

INTERROGATORY NO. B.33:

Has any worker employed by your company, its subsidiaries or affiliates ever filed a worker's compensation claim against defendant or its predecessors, affiliates or subsidiaries, for an occupational disease or condition which was allegedly caused by

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exposure to asbestos, asbestos products, asbestos dust or fibers? If so, set forth:

a. The date each claim was made;

b. Where each claim was made;

c. The name and address of the party making the claim; and

d. The name and address of the party against whom the claim was made.

RESPONSE TO INTERROGATORY NO. B.33:

See general objections 4 and 5. Subject to its objections, Union Carbide responds as follows:

No worker from the King City facility, where Calidria was mined and milled has ever filed such a claim.

INTERROGATORY NO. B.34:

If any employee or officer of defendant has testified at trial or by deposition in any litigation involving an alleged occupational exposure to asbestos, state:

a. Name, address and title of each such person who testified;

b. Date, location and form of testimony; and

c. Whether defendant has a copy of such testimony.

RESPONSE TO INTERROGATORY NO. B.34:

See general objections 4 and 5. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

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Union Carbide has presently identified the following asbestos-related testimony which may or may not relate to Union Carbide products:

1) John L. Myers

A) Lester Rice v. Union Carbide Corporation, U.S.D.C., District of South Carolina, Civil Action No. 81-977-9, April 9, 1982.

B) Simon DeWard v. Johns-Manville, et al., Superior Court for the County of Los Angeles, Civil Action No. C-298717 (and related cases), August 30, 1984.

C) Bobby R. Sanford v. Johns-Manville Sales Corp. et al., Southern District of Texas, Galveston Division, No. G-82-325, September 4, 1986.

D) Shirley Tate v. Certain-Tweed Corp., et al., District Court, 46th Judicial District, Hardeman County, Texas, No. 7591.

C) Shirley Tate v. 3 M Corporation, et al., District Court, 94th Judicial District, Nueces County, Texas, No. 85-1559-C, July 27, 1987.

E) Union Carbide Asbestos Removal Litigation Pennsylvania Cases, Bridgeport, Connecticut April 28, 1988.

2) Carl U. Derndehl, M.D.

A) John Worm v. Rubicon Chemicals, Inc., et al., U.S.D.C., District of Minnesota, 4th Division, St. Paul, Minnesota, No. 4-81-748, October 21, 1982.

B) Henry Garry v. Union Carbide Corporation, U.S.D.C., Eastern District of Arkansas, Western Division, Civil No. LR-C-83-921, February 11, 1985.

3) Robert E. Peele

A) Asbestos Cases
Huntington, West Virginia, September 9-10, 1981.

B) Asbestos Cases
Southern District of Georgia, October 7, 1981.

C) Freda K. Knight v. Union Carbide Corporation, U.S.D.C. Southern District of West Virginia, Huntington, W.VA., Civil Action No. 84-3425, May 22,

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1987.

4) William Paul Woods

A) Keith Edwin Gibson v. Armstrong World Industries, Inc., et al., U.S.D.C. District of Colorado, Consolidated Civil Action No. 83-K-1756; Civil Action No. 84-K-912, May 18, 1987.

5) Richard J. Sexton, M.D.

A) Freda K. Knight v. Union Carbide Corporation, U.S.D.C. Southern District of West Virginia, Huntington, W.VA., Civil Action No. 84-3425, May 14, 1987.

6) Bert K. Barton

A) James W. Manisto v. American Brake Block Corporation et al., District Court, First Judicial District, Dakota County, Minneapolis, Minnesota, NO. C-5-88-1008, January 26, 1989.

B) Robert P. Payne, Josephine Stala as Administratrix of the Estate of Stanley Stala v. Advocate Mines, et al., Supreme Court of N.Y. Law Div., Middlesex County, Doc. No. L-10917-85, October 27, 1988.

7) Thomas J. Hall, M.D.

A) James W. Manisto v. American Brake Block Corporation, et al., District Court, First Judicial District, Dakota County, Minneapolis, Minnesota, NO. C-5-88-1008, January 10, 1989.

8) Howard Stephens

A) Keith Edwin Gibson v. Armstrong World Industries, Inc. et al., U.S.D.C. District of Colorado, Consolidated Civil Action No. 83-K-1756; Civil Action No. 84-K-912, May 18, 1987.

9) Myron Bennett

A) Keith Edwin Gibson v. Armstrong World Industries, Inc., et al., U.S.D.C. District of Colorado, Consolidated Civil Action No. 83-K-1756; Civil Action No. 84-K-912, May 18, 1987.

10 Harrison B. Rhodes, PhD.

A) Marie B. Soignet v. Montello, Inc., et al., U.S.D.C. for Eastern District of Texas, Beaumont

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Division, 8-86-1193-CA, January 19, 1989.

INTERROGATORY NO. B.35:

Has defendant at any time since its inception, maintained any office or department dealing with medical research? If so, state:

a. The name of each such department;

b. The dates each such department was in operation; and

c. The name, address and job position of each such person who has been in charge of said department or departments.

RESPONSE TO INTERROGATORY NO. B.35:

See general objections 4 and 5. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, oppressive and harassing, irrelevant, immaterial, and unlikely to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Union Carbide's Medical Department was formally organized in 1939. Prior to that Union Carbide and Union Carbide facilities consulted physicians as appropriate upon need. The medical directors at Union Carbide have included the following individuals for the years respectively indicated below:

(1) Girard Cranch [1938-1945]

(2) Thomas Nale [1945-1963]

(3) John J. Welsh [1963-1978]

(4) Thomas A. Lincoln [1978-1985]

(5) T. Guy Fortney [1985-1989]

(6) Jean Case [1989-Present]

The present duties of Union Carbide's medical director

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include coordination of all of Union Carbide's medical programs, including employee physical examination programs; recommendations with respect to medical policies, standards and procedures; and administration of medical services at Union Carbide's corporate headquarters, a corporate epidemiology program, a medical program for employees traveling overseas and an alcoholism prevention and treatment program. The medical director reports to the corporate Vice President in charge of Union Carbide's Community and Employee Health, Safety and Environmental Protection Department.

In addition, Dr. Hilton Lewinsohn currently serves as Medical Director, Chemicals & Plastics Company, Inc. Dr. Lewinsohn is a recognized expert in asbestos-related medical matters and pathologies.

INTERROGATORY NO. B.36:

When was the first time the defendant became aware of or knowledgeable of any disease or illness associated with or causally related to the inhalation of asbestos, asbestos fibers or asbestos dust in any form whatsoever? Indicate which disease defendant became aware of and describe how defendant became aware of its alleged relationship to inhalation or exposure to asbestos.

RESPONSE TO INTERROGATORY NO. B.36:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

See Union Carbide's responses to interrogatories B.5 and

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B.16. Union Carbide's knowledge concerning potential health hazards possibly associated with excessive asbestos fiber inhalation developed gradually. Sources of information as to possible health concerns of which Union Carbide is presently aware included general and scientific literature on the topic and reports or memoranda by Union Carbide employees. Upon the plaintiff's request, copies of such reports and memoranda, which Union Carbide has located, will be made available at a suitable time and place for review and duplication by the plaintiff.

INTERROGATORY NO. B.37:

In reference to the preceding interrogatory, if defendant acknowledges a casual relationship between asbestos and disease or illness, set forth the following information:

a. What diseases or illnesses defendant acknowledges are causally related to or associated with exposure to asbestos dust or fibers;

b. The date upon which defendant became aware of the association with or casual relation to each such disease or illness;

c. The date upon which defendant confirmed the casual relation of each such disease to exposure to asbestos dust or fibers; and

d. How defendant became aware of each such casual relationship or association, indicating the source of all such information.

RESPONSE TO INTERROGATORY NO. B.37:

See general objection 4. Union Carbide also objects to

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this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide further objects to this interrogatory on the grounds that it calls for Union Carbide to make an expert medical and/or scientific opinion. Subject to its objections, Union Carbide responds as follows:

See Union Carbide's response to interrogatory no. B.36. Union Carbide recognizes that the excessive inhalation of asbestos fiber may be associated with the development of serious and potentially fatal disease. Union Carbide also understands that the onset and development of such disease in a person may be related to and affected by, among other factors, the particular type of fiber that is inhaled, cigarette smoking, and environmental conditions, in addition to the person's medical history and condition.

INTERROGATORY NO. B.38:

If your company manufactured any products which contained asbestos and which were commonly used by insulation workers and pipe coverers, describe how the following products were cut, shaped, mixed and applied when used:

a. Asbestos cement;

b. Asbestos containing pipe covering;

c. Asbestos sheeting; and

d. Asbestos insulation to cover extremes of heat as well as cold.

RESPONSE TO INTERROGATORY NO. B.38:

See general objection 4. Union Carbide objects to this

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interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

See Union Carbide's response to Interrogatory no. B.14. Union Carbide never manufactured or sold pipe insulation. Calidria asbestos was not suitable for use as standard thermal or frost insulation or due to its quality and composition, in particular, due to the short length of its fiber.

INTERROGATORY NO. B.39:

Prior to 1964, were there any memoranda written by, distributed, or circulated among defendant's employees, agents or representatives concerning the potential health hazards concerned with asbestos containing products? If so, state:

a. Dates of each memorandum;

b. Name, address and job position of each individual who wrote each memorandum;

c. Name and address and job position of each individual to whom the memorandum was directed;

d. Where each memorandum is kept; and

e. Attach copies of each memorandum hereto.

RESPONSE TO INTERROGATORY NO. B.39:

See general objections 1, 4 and 5. Union Carbide further objects to this interrogatory on the grounds that it seeks information which would require the disclosure of information protected by the attorney-client privilege or work product doctrine. Union Carbide also objects on the grounds that it is

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overly broad, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

See Union Carbide's response to interrogatory no. B36. Upon the plaintiff's request, copies of such relevant memoranda, which Union Carbide has located, will be made available at a suitable time and place for review and duplication by the plaintiff. These memoranda, if any, are under the control of either counsel for Union Carbide or Ms. Karen Carl, Custodian of Documents, Kelley Drye & Warren, Six Stamford Forum, Stamford, Ct. 06901.

INTERROGATORY NO. B.40:

Has defendant or its predecessor corporations ever had a division, affiliate or subsidiary which was involved in contracting for or installation of asbestos-containing materials in New Jersey? If so, for each such entity involved in the contracting or installation of these products, set forth the following information:

a. Name of each such entity and the nature of its relationship to the parent corporation; and

b. The exclusive dates that each of the above mentioned entities were in existence.

RESPONSE TO INTERROGATORY NO. B.40:

See general objection 5. Union Carbide also objects to this interrogatory on the grounds that it is unclear, vague, ambiguous, overly broad, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union

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Carbide responds as follows:

No, Union Carbide and/or its predecessor corporations never operated a business, division, affiliate or subsidiary which specifically contracted for or installed asbestos-containing materials in New Jersey. Union Carbide did at one time own a subsidiary which built private homes in New Jersey.

INTERROGATORY NO. B.41:

Did defendant ever provide any of the employees who worked in the contracting for or installation of asbestos containing materials with any respirators, face masks or protective clothing? If so, indicate what types of protective clothing, respirators or face masks were provided, describe when each type was first provided to each employee and describe why they were provided to each type of employee.

RESPONSE TO INTERROGATORY NO. B.41:

Not applicable. See Union Carbide's response to interrogatory no. B.40.

INTERROGATORY NO. B.42:

Has any individual who was ever employed in the contracting and insulation business referred to above ever filed a claim for workmen's compensation because of an alleged occupational disease sustained allegedly because of occupational exposure to asbestos? If so, for each such employee who has filed a claim set forth the following information:

a. Name of each such employee;

b. When each claim was filed;

c. Where each claim was filed; and

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d. Name of the attorney who represented the petitioner and respondent.

RESPONSE TO INTERROGATORY NO. B.42:

Not applicable. See Union Carbide's response to interrogatory no. B.40.

INTERROGATORY NO. B.43:

State the full name, job title and present residences, business and professional addresses of any and all persons who have knowledge of any relevant facts relating to this case and the defense of your company. Unless already set forth in answers to a prior question, set forth in detail the facts of which each person allegedly has knowledge.

RESPONSE TO B.43:

See general objection 4. Union Carbide further objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and vague. Subject to its objections, Union Carbide responds as follows:

See Exhibit B attached. Additionally, Union Carbide has not completed an investigation of facts that specifically relate to this particular case and reserves the right to name additional individuals in the future. The responses to these interrogatories were prepared by counsel for Union Carbide Corporation based on information either contained in business records or provided by present and former Union Carbide employees. In particular, John L. Myers, former Product and Production Manager for asbestos (Calidria) has provided much information. Sales and other business records used to respond to these interrogatories are under the

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control of Ms. Karen Carl, Custodian Records, Kelley Drye & Warren, Six Stamford Forum, Stamford, CT 06901.

INTERROGATORY NO. B.44:

State the name, address and credentials of each and every expert witness you intend to utilize at the time of trial, and annex hereto a copy of their report.

RESPONSE TO B.44:

Union Carbide objects to this interrogatory on the grounds that it purports to call for disclosure of information protected by the attorney-client privilege and work product doctrine. Union Carbide further objects on the grounds that this interrogatory improperly and prematurely seeks the disclosure of experts in contravention to the statutory procedures of discovery. Subject to its objections, Union Carbide responds as follows:

See Exhibit B and C. Union Carbide has not yet determined which expert witnesses, if any, it will call at a trial of this case, but reserves the right to call the individuals listed on the attached and to supplement its responses to this interrogatory, if and when the information becomes available through the continuing course of discovery.

INTERROGATORY NO. B.45:

Do you contend that the plaintiff's illness is a consequence of the negligence or the fault of a third party or anyone who is not a party to this action? If so, state the name and address of each such party and set forth all facts which support your contention.

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RESPONSE INTERROGATORY TO B.45:

Union Carbide objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, oppressive, seeks to invade the attorney-client privilege and the work product doctrine and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

At this time, Union Carbide lacks sufficient information to respond to this interrogatory. Discovery and investigation are ongoing.

INTERROGATORY NO. B.46:

Do you contend that the illness and/or death of the decedent in this action was not causally related to an occupational exposure to asbestos dust and fibers? If so, give a full and detailed description of your contentions.

RESPONSE TO INTERROGATORY NO. B.46:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, harassing and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide further objects to this interrogatory on the grounds that it calls for Union Carbide to render an expert medical opinion. Subject to its objections, Union Carbide responds as follows:

At this time, Union Carbide lacks sufficient information to respond to this interrogatory. Discovery and investigation are ongoing.

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INTERROGATORY NO. B.47:

Do you contend that other agents and/or substances caused the illness and/or death of the plaintiff in this matter? If so, identify each such agent and/or substance and set forth all facts to support your contentions.

RESPONSE TO INTERROGATORY NO. B.47:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, harassing and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide further objects to this interrogatory on the grounds that it calls for Union Carbide to render an expert medical opinion. Subject to its objections, Union Carbide responds as follows:

At this time, Union Carbide lacks sufficient information to respond to this interrogatory. Discovery and investigation are ongoing.

INTERROGATORY NO. B.48:

Has defendant and/or its agents or employees obtained any statements from anyone who has knowledge of the facts surrounding this cause of action? If so, set forth:

a. Name, address and job position of the person that obtained the statement;

b. The name, address and job position of the person who gave the statement;

c. The date the statement was given; and

d. Whether the statement is in writing, and if so, who has custody of it.

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RESPONSE TO INTERROGATORY NO. B.48:

Union Carbide objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide also objects to this interrogatory on the grounds that it seeks information protected by the attorney-client privilege and work product doctrine. Subject to its objections, Union Carbide responds as follows:

Discovery and investigation are ongoing. See Union Carbide's response to interrogatory no. B43. At this time, Union Carbide, its agents or employees have not obtained any statements from anyone who has knowledge of the facts surrounding this cause of action.

INTERROGATORY NO. B.49:

Does defendant contend that plaintiff or plaintiff's decedent suffered injuries and/or death due to his own negligence? If so, set forth all facts which support your contentions.

RESPONSE TO INTERROGATORY NO. B.49:

Union Carbide objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

At this time, Union Carbide lacks sufficient information to respond to this interrogatory. Discovery and investigation are ongoing.

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INTERROGATORY NO. B.50:

. Does defendant contend that plaintiff or plaintiff's decedent failed to use defendant's asbestos or asbestos containing products properly? If so, set forth all facts which support your contentions.

RESPONSE TO INTERROGATORY NO. B.50:

Union Carbide objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

At this time, Union Carbide lacks sufficient information to respond to this interrogatory. Discovery and investigation are ongoing.

INTERROGATORY NO. C.1:

Has defendant and/or its affiliates or subsidiaries purchased asbestos fiber for use in its business or for manufacturing its products? If so, set forth the following information:

a. The inclusive dates that your company purchased asbestos fiber;

b. The name and address of each and every entity that you purchased the asbestos fiber from;

c. The nature and types of products that your company used asbestos fiber for; and

d. The type of asbestos fiber that your company purchased.

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RESPONSE TO INTERROGATORY NO. C.1:

See general objections 4 and 5. Union Carbide objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, harassing and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Except for limited experimental productions, Union Carbide never used Calidria in its own products. See Union Carbide's response to interrogatory B.14. Other asbestos used in those products was purchased from other companies.

INTERROGATORY NO. C.2:

Does defendant have or has it had any plants, factories or production facilities located in the State of New Jersey which were or are engaged in the importation, manufacture, processing, converting, compounding, packaging, distribution, and/or sale of asbestos, asbestos containing products and/or asbestos containing insulation products? If so, for each such plant, factory or facility which is or has been located in New Jersey, set forth the following information:

a. The name and address of each such plant, factory or production facility;

b. The inclusive dates that each plant, factory or facility existed; and

c. A complete and detailed description of all products that each plant, factory or production facility was engaged in producing (include in your description the type of product and its generic and trade name).

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RESPONSE TO INTERROGATORY NO. C.2:

See general objection 4. Union Carbide objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, vague and ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Some Union Carbide facilities were involved with the manufacture of asbestos-containing products, not at issue in this case. See Union Carbide's responses to interrogatories A.4 and B.14. Union Carbide's New Jersey facilities were not involved in any way with handling or selling Calidria (except for limited experiments) except for administrative work not involving the actual product, such as drafting of labels.

INTERROGATORY NO. C.3:

Indicate which asbestos products and asbestos materials manufactured and distributed by the defendant are or were classified as "insulating materials."

RESPONSE TO INTERROGATORY NO. C.3:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

None, except for a type of electrical insulation, (certain Bakelite brands) Union Carbide never made insulation of any sort and in particular, never made pipe or thermal or frost insulation. Calidria asbestos was not suited and could not be marketed for use

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as thermal or frost insulation due to its quality and composition, in particular, the short length of its fiber.

INTERROGATORY NO. C.4:

With reference to the preceding question, give a full and complete description of the purposes for which defendant's asbestos containing insulating materials were designed.

RESPONSE TO INTERROGATORY NO. C.4:

Not applicable, see Union Carbide's response to interrogatory C3.

INTERROGATORY NO. C.5:

Set forth the name and address of each and every entity that your company purchased or received asbestos fiber from which was utilized in the manufacture of your company's asbestos containing insulation products. Include in your answer the inclusive dates that your company purchased asbestos from each such entity.

RESPONSE TO INTERROGATORY NO. C.5:

Not applicable, see Union Carbide's response to interrogatory C3.

INTERROGATORY NO. C.6:

As to any asbestos products or raw asbestos mined, converted, fabricated, produced, compounded, manufactured, processed, sold or distributed by defendant, state whether any was shipped or sold to plaintiff's employer in New Jersey either directly or through a third party, stating which.

RESPONSE TO INTERROGATORY NO. C.6:

See general objection 4. Union Carbide also objects to

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this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Union Carbide possesses copies of invoices of Calidria sales made by Union Carbide to Calidria customers. Union Carbide also maintains a computer data base of such sales. Since Union Carbide sold its Calidria business in 1985, Union Carbide, at present, can make no representation as to the completeness of its records. The aforementioned constitute the most complete records of Calidria sales currently available to Union Carbide. Union Carbide lacks, however, a record of sales made by Calidria distributors, who accounted for approximately 25% of all Calidria sales.

According to Union Carbide's Calidria sales and shipping records, there were no sales to Kentile's or GAF's New Jersey facilities during the period of plaintiff's employment. Union Carbide made one sale of 6 lbs. Calidria RG-600 to American Cyanamid in 1974.

Upon plaintiff's request, Union Carbide will make its sales records available to the plaintiff for review and duplication at a suitable time and place.

INTERROGATORY NO. C.7:

If the answer to C6 is in the affirmative, state as to each asbestos product, or raw asbestos:

a. Exactly what product(s) or type(s) of asbestos was (were) shipped or sold to plaintiff's employer;

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b. The dates and quantities of each such product shipped or sold;

c. Whether any warnings, cautions, caveats or directions accompanied the materials so shipped, the date these appeared and the exact wordings of the warnings, cautions, caveats or directions and where the warnings, cautions, caveats or directions appeared;

d. The name and address of any intermediate supplier or distributor who sold this defendant's products to plaintiff's employer during the period referred to above;

e. Did your company affix its corporate logo or insignia on the packages of asbestos containing insulation products that it distributed and sold? If so, describe the type of logo or insignia which was used, indicate which products it was affixed to, and set forth the inclusive dates that each insignia or logo was utilized. Annex hereto a photograph or copy of each such logo described in this matter; and

f. Please describe in detail the type of packages in which defendant has sold, distributed or manufactured asbestos material, listing the dates each type of package was used, a physical description thereof and description of any printed material or trademark that appeared thereon.

RESPONSE TO INTERROGATORY NO. C.7:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

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a,b) See Union Carbide's response to interrogatory no. C. 6. Calidria consisted of raw chrysotile asbestos with a unique short-fiber configuration which was sold in pelletized and fiberous form. See Union Carbide's response to interrogatory no. B.15.

c) Union Carbide had used two cautionary statements on its Calidria packaging: The first cautionary statement was used from June 22, 1968 through May 1972, and read as follows: "Warning: Breathing dust may be harmful. Do not breathe dust." The second cautionary statement was prescribed by OSHA in 1972 and was first printed on Calidria packaging in June of that year and was used by Union Carbide until the sale of the Calidria mine and mill in 1985; this second cautionary statement read as follows: "Caution. Contains asbestos fibers. Avoid creating dust. Breathing asbestos dust may cause serious bodily harm."

(d) Union Carbide has no record of the use of distributors for sales to plaintiff's employer. However, approximately three-quarters of Calidria sales were made directly by Union Carbide. Distributors accounted for the remaining approximate 25% of all Calidria sales. Union Carbide, however, no longer mines or sells Calidria and thus no longer maintains Calidria distributors. The following is a list of former Calidria distributors which Union Carbide has been able to identify:

Presently Known Former Calidria Distributors (1963-1985)

1) Allied Resin Corporation

2) American Industrial Chemical Corporation

3) Bouffard Associates

4) A.T. Callas Company

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5) D. & F. Distributing, Inc.

6) Harrisons & Crosfield (Canada)

7) Harrisons & Crosfield (Pacific)

8) Lenape Chemicals, Inc.

9) Technical Petroleum Company

10) Technical Products, Inc.

11) Montello, Inc.

12) Harwick Chemical Corp.

13) Plastex, Inc.

14) Union Carbide International

15) Western Chemical & Manufacturing Company

16) McKesson Chemicals, Inc.

17) Apperson Chemicals, Inc.

18) Amsco Division - Union Oil Company of Calif.

19) Hamblet & Hayes Co.

20) Marco Chemical Division - W. R. Grace & Company

21) Wonder State Industries

22) The Permutit Co., Inc.

23) Van Waters and Rogers

24) Ambrosia Industrial, Inc.

25) Southern Fiberglas Supply

e,f) Calidria asbestos was mostly transported in plastic or Kraft type paper bags, although some Calidria had been shipped in bulk in railroad hopper cars. Each bag contained the following information: Union Carbide's corporate name and address, the net weight of material supplied, the applicable grade of asbestos, the lot number identification, and starting in 1968 a cautionary

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statement. At the request of some customers, a limited amount of Calidria asbestos was sold in plain Kraft bags, which contained only a cautionary statement. Unless the customer requested otherwise, between approximately the mid-1970's and June 1985 all Kraft bags containing Calidria asbestos were individually shrink wrapped (encased by a tight fitting plastic film); an entire pallet containing a number of such bags was also completely covered with the tight fitting plastic film.

INTERROGATORY NO. C.8:

Have any of the products listed in Interrogatory C7 above been altered in chemical composition since being marketed? If so, set forth the following information:

a. The date of each alteration;

b. A detailed description of the nature of each alteration; and

c. The reason for such alteration.

RESPONSE TO INTERROGATORY NO. C.8:

See general objection 4. Subject to its objections, Union Carbide responds as follows:

No, Calidria always consisted of raw chrysotile asbestos, sold in pelletized and fiberous forms, with the same chemical composition, however, different chemical treatments may have been applied to the product over the course of the Calidria business.

INTERROGATORY NO. C.9:

Have you discontinued manufacturing and/or distributing and/or supplying or selling any asbestos or asbestos products referred to in C7. If so, set forth the following information:

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a. What such product is;

b. The reasons therefor; and

c. When the discontinuance took place.

RESPONSE TO INTERROGATORY NO. C.9:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, vague and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Yes. Union Carbide sold its Calidria asbestos mine and business in June 1985 for business reasons.

If your answer to C6 is either "No" or "unknown" but your answer to B14 is "Yes" provide answers to C10 through C18. Otherwise you may proceed to C19.

INTERROGATORY NO. C.19:

Has your company manufactured asbestos containing products and materials which were distributed by another entity or corporation under their name or trademark? If so, identify each such entity which sold or distributed these products, indicate which of your company's products this company marketed and indicate the inclusive dates that this particular commercial arrangement existed.

RESPONSE TO INTERROGATORY NO. C.19:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide

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responds as follows:

Union Carbide sold its asbestos initially as Union Carbide Asbestos and then under the name "Calidria". Union Carbide, however, packaged Calidria asbestos for the Montello Corporation for sale under the tradenames of Visbestos, Super Visbestos, Telvis, Imcobest and Univis. Union Carbide also packaged Calidria for the ARCO company for sale under the name Arcovis, and for the International Mines and Chemical Company for sale under the name Surelift. Calidria was also sold domestically in limited quantities under the names Visquick and Oilbestos by distributors which Union Carbide is presently unable to identify. Union Carbide objects to responding to this interrogatory with respect to overseas sales on the grounds that such information is irrelevant and immaterial to matters at issue in this case.

INTERROGATORY NO. C.20:

Has your company marketed under its own name or trademark any asbestos containing insulation products which were manufactured by another corporation? If so, identify each and every product which your company marketed which was manufactured by another corporation, indicate the inclusive dates that you marketed each product and describe the name, tradename and generic name of each such product which your company marketed.

RESPONSE TO INTERROGATORY NO. C.20:

See general objection 4. Subject to its objections, Union Carbide responds as follows:

No, See Union Carbide's response to interrogatory C3.

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INTERROGATORY NO. C.21:

Were any of the asbestos containing insulation products that defendant sold or distributed into the stream of commerce accompanied by written instructions or package inserts? If so, indicate which such products were provided with such instructions and package inserts, indicate when each product was accompanied by these materials, state the substance of what the instructions or package inserts stated and annex copies of same hereto.

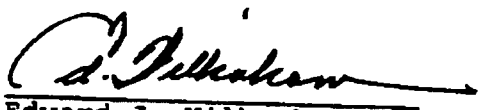
RESPONSE TO INTERROGATORY NO. C.21:

See general objection 4. Subject to its objections, Union Carbide responds as follows:

Not applicable; see Union Carbide's response to interrogatory no. C.20.

DATED:

WILBRAHAM & COLEMAN

By: 

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Attorneys for:
UNION CARBIDE CORPORATION

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10/22/91
11:00 A.M.

Union Carbide trial exhibit Union Carbide 816B: Arthur D. Bromberg to Angelo Cifaldi Transmitting Union Carbide's... Published by AsbestosClaims.Law
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VERIFICATION

STATE OF CONNECTICUT)
) ss.:
COUNTY OF FAIRFIELD)

JOHN MACDONALD, being duly sworn according to law, deposes and says that he is Secretary of Union Carbide Chemicals and Plastics Company Inc., defendant in this action; that he has read the foregoing Responses to Plaintiff's Form B Interrogatories; which has been prepared by employees and counsel of Union Carbide Chemicals and Plastics Company Inc. who have informed deponent that the foregoing Responses are true.

John Macdonald
Secretary

Sworn to before me this 11TH
day of OCTOBER, 1991.

Notary Public

DOROTHY M. BAUER
NOTARY PUBLIC
MY COMMISSION EXPIRES MARCH 31, 1994