

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION

HENRY GARRY — PLAINTIFF

VS. CIVIL ACTION NO. LR-C-83-921

UNION CARBIDE CORPORATION — DEFENDANT

PLAINTIFF'S SUPPLEMENTAL REQUEST FOR ADMISSIONS INTERROGATORIES, AND MOTION FOR PRODUCTION OF DOCUMENTS

Comes the Plaintiff and for its supplemental request for discovery does submit the following to be answered by the Defendant Union Carbide Corporation under oath as provided by the Federal Rules of Civil Procedure. In addition, Plaintiff herein will be asking for the production of certain documents for inspection and copying on April 15, 1985, at 9:00 a.m. at the office of Ed Lowther, Attorney for Union Carbide Corporation, Wright, Lindsey & Jennings, 2200 Worthen Bank Building, Little Rock, Arkansas, 72201. Plaintiff's counsel will be responsible for the expense of copying any documents produced at said inspection.

MOTION TO PRODUCE NO. 1: (A) Please provide copies of resumes, reports, and any other written memoranda or communication in possession of Defendant Union Carbide Corporation and Union Carbide, U.K. Limited, relating to any and all information relating to any and all information as to asbestos or asbestos-containing products for the following employees or former employees of Union Carbide Corporation:

A. I.C. Sayers;
B. Dr. Dernehl;

C. Mr. Cheston;
D. Mr. Sly;
E. Dr. T.J. Hall;
F. Mr. F. Mumpton;
G. Mr. F.A. Schillinger;
H. Mr. C.F. Martino;
I. Mr. P.B. Potter;
J. Mr. J.R. Stringer;
K. Mr. E. Bell;
L. Mr. W.L. Carrick;
M. Mr. F.W. Ducca;
N. Mr. J.L. Goodson;
O. Mr. H.C. Gunst;
P. Mr. E.W. Krummel;
Q. Mr. L. Madestau;
R. Mr. R.T. Marold;
S. Mr. R.A. Ream;
T. Mr. P.S. O'Neal; and
U. Mr. P.A. Thomas;

(B) As to each individual listed above, please provide their last known addresses and telephone numbers.

MOTION TO PRODUCE NO. 2: Please provide a copy of the Asbestos Toxicology Report by Dr. Dernehl.

MOTION TO PRODUCE NO. 3: Please provide a copy of all communications to or from the Union International Contre Cancer Organization and Union Carbide Corporation.

MOTION TO PRODUCE NO. 4: Please provide a copy of all communications between Defendant and the Pneumoconiosis Research Unit, Penarth, South Wales, including, but not limited to, all asbestos information data to and from Dr. V. Timbrell.

MOTION TO PRODUCE NO. 5: Please provide for inspection and copying all advertising layouts, designs, and marketing proposals used in the design and marketing of Union Carbide R.G.-244 Asbestos bags. Do not provide the information for Calidria or any pelletized Union Carbide asbestos-containing product. Also, provide the names of the persons designing the bag labels and any caution labels, and the name of the person or company that manufactured the bags.

MOTION TO PRODUCE NO. 6: Please provide for inspection and/or copying all advertising and sales brochures relating to the sale of R.G.-244, including photographs of the finished product from 1963 until present.

Defendant is to provide the above information within thirty (30) days of service of this notice and to otherwise make available for copy and inspection on April 15, 1985, all documents listed above.

Respectfully submitted,

EDWARD O. MOODY, P.A.
506 First Federal Plaza
Little Rock, Arkansas 72201
(501) 376-0000

By: Ed Moody
Edward O. Moody

CERTIFICATE OF SERVICE

I, Edward O. Moody, do hereby certify that I have furnished a copy of the above and foregoing to Mr. Fred Baron, Attorney at Law, 1050 Dallas Federal Savings Tower, Dallas, Texas, 75225; and Mr. Ed Lowther, Attorney at Law, 2000 First Commercial Building, Little Rock, Arkansas, 72201, on this 6th day of March, 1985.

Ed Moody
Edward O. Moody