PLAINTIFF'S EXHIBIT
tabbies
UC-1654

NO. 4886*RM98

BONNIE CAMPBELL, THOMAS KARRY HALL; JERRY DEAN HUFFMAN; JOSEPH ARNOLD MULLINS; CHESS WASHINGTON; and ARNOLD WILEY WALDREP	§	IN THE DISTRICT COURT
Plaintiffs,	§	
VS.	§	BRAZORIA COUNTY
OWENS CORNING (a/k/a OWENS CORNING CORPORATION), et al	§	
Defendants.	§	149TH JUDICIAL DISTRICT

DEFENDANT UNION CARBIDE CHEMICAL & PLASTICS CO., INC.'S RESPONSES TO PLAINTIFF'S REQUEST FOR DISCLOSURE

COMES NOW, Defendant, Union Carbide Chemical & Plastics Co., Inc.'s, and files these Responses to Plaintiff's Request for Disclosure.

Respectfully submitted,

POWERS & FROST, L.L.P.

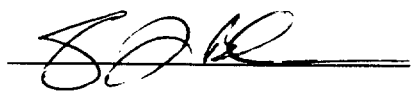
By: _____

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COUNSEL FOR DEFENDANT, UNION CARBIDE CHEMICAL & PLASTICS CO., INC.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing instrument has been forwarded to counsel of record for Plaintiffs, herein, Ms. Stephanie Finch, Baron & Budd, P.C., 3102 Oak Lawn Blvd., Ste. 1100, Dallas, Texas 75219-4281, via Certified Mail, Return Receipt Requested, and to all other counsel of record via first class U.S. mail this the 26th day of July, 2000.



Union Carbide trial exhibit UC-1654: Union Carbide Chemical & Plastics Co., Inc.'s Responses to Plaintiffs' Request... Published by AsbestosClaims.Law
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DEFENDANT UNION CARBIDE CHEMICAL & PLASTICS CO., INC.'S RESPONSES TO REQUEST FOR DISCLOSURE

(a) The correct names of parties to this lawsuit;

Defendant is unaware at this time that any parties to this lawsuit have been incorrectly named.

(b) the name, address, and telephone number of any potential parties;

Defendant is unaware at this time of any potential parties who have not been named in Plaintiffs' Petition.

(c) the legal theories and, in general, the factual bases of the responding party's defenses (the responding party need not marshal all evidence that may be offered at trial;

Defendant's defenses are outlined in its Answer to Plaintiffs' Petition and any amendments filed thereto. Without waiving any defense stated therein, Defendant contends the following generally:

Defendant will dispute that Plaintiff(s)'s alleged injuries are asbestos related. Defendant contends that each Plaintiff contributed to cause his or her own alleged injury and/or death by smoking and/or other actions and lifestyle choices. Defendant also contends that the acts or omissions of others contributed to cause each Plaintiff's alleged injuries and/or death.

No product manufactured, sold or distributed by Defendant caused any alleged injury to Plaintiff(s). Each Plaintiff was either not exposed to Defendant's products, or any alleged exposure did not contribute to cause any Plaintiff's alleged injury. Defendant will present a "state of the art" defense to demonstrate that Defendant was charged with

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