WILLIAM J. SAYERS (SBN 078038)
FARAH S. NICOL (SBN 162293)
SUSAN WEISENBERG GILEFSKY (SBN 190321)
McKENNA & CUNEO, L.L.P.
444 South Flower Street, 8th Floor
Los Angeles, California 90071-2901
Telephone: (213) 688-1000
Facsimile: (213) 243-6330

Attorneys for Defendant
UNION CARBIDE CORPORATION
(formerly known as Union Carbide Chemicals and Plastics Company, Inc.)

PLAINTIFF'S EXHIBIT
UC-5184

RECEIVED
MAR 27 2002

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

KLAUS BRAUCH and SUSAN BRAUCH,

Plaintiffs,

vs.

BONDEX INTERNATIONAL, INC., et al.,

Defendants.

CASE NO. BC 258492

UNION CARBIDE CORPORATION'S AMENDED RESPONSES TO PLAINTIFF'S REQUEST FOR ADMISSIONS (SET ONE)

PROPOUNDING PARTY: PLAINTIFF KLAUS BRAUCH

RESPONDING PARTY: UNION CARBIDE CORPORATION (formerly known as Union Carbide Chemicals and Plastics Company, Inc.)

SET NO.: ONE

Defendant Union Carbide Corporation provides the following Amended responses to plaintiffs' Request for Admissions, set one, after locating further documentation.

PLAINTIFF'S EXHIBIT
tabbies
WK VC 6060

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for Ad... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 1 of 29 asbestosclaims.law/library/19669/1

GENERAL OBJECTIONS

Union Carbide Corporation ("Union Carbide") objects to the entire set of Plaintiff's Requests for Admissions on the following grounds, which are hereby incorporated by reference in Union Carbide's Responses to individual Requests for Admissions below:

GENERAL OBJECTION NO. 1:

Union Carbide states that trial preparation and factual investigation are ongoing. Union Carbide's responses to these Requests for Admissions 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 Requests for Admissions, and specifically objects to each of these Requests to the extent that they seek to impose any such continuing obligation upon Union Carbide. To the extent the information contained herein differs in any respect from any prior responses to discovery, this response shall be deemed to update and supersede such prior responses.

GENERAL OBJECTION NO. 2:

Union Carbide objects to plaintiff's Requests for Admissions in their entirety on the grounds that they are 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 Requests for Admissions as phrased.

GENERAL OBJECTION NO. 3:

Union Carbide also objects to all Requests for Admissions insofar as they would require the disclosure of information protected by the attorney-client privilege or work product doctrines.

GENERAL OBJECTION NO. 4:

Union Carbide objects to providing information about any asbestos-containing products which it has manufactured, sold or distributed, on the grounds that the asbestos fiber in those

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for Ad... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 2 of 29 asbestosclaims.law/library/19669/2

products was encapsulated by or embedded in other material and on the grounds that the plaintiff has made no allegation of exposure to those products. All responses to these Requests for Admissions refer to Calidria asbestos only, unless otherwise stated.

GENERAL OBJECTION NO. 5:

Union Carbide objects to this entire set of Requests for Admissions to the extent that they call 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. Any pertinent information which the employee or premises information can be said to reflect can be requested directly without requesting the irrelevant and immaterial information or documentation about employees or premises.

GENERAL OBJECTION NO. 6:

Union Carbide objects to the entire set of Requests for Admissions to the extent that they call for information beyond this plaintiff's claims about asbestos-containing products to which Union Carbide allegedly supplied raw asbestos fiber contained in the Case Report filed pursuant to the Los Angeles Asbestos First Amended General Order No. 29. Union Carbide therefore limits its Responses to the Requests for Admissions to the claims regarding Union Carbide found in plaintiff's Case Report which was served on December 20, 2001. Specifically, these Responses are limited to plaintiff's contention that Union Carbide Corporation was a supplier of raw asbestos fiber to United States Gypsum Company and National Gypsum Company for use in their asbestos-containing joint compound products to which plaintiff claims he was exposed in 1968. As such, these Responses are limited to the relevant timeframe of the plaintiff's claims, in particular prior to and including 1968.

RESPONSES TO REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that on You mined raw asbestos.

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for Ad... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 3 of 29 asbestosclaims.law/library/19669/3

RESPONSE TO REQUEST FOR ADMISSION NO. 1:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Admitted that for a period of time Union Carbide mined a unique, short fiber chrysotile asbestos ore called Calidria from the California New Idria deposit.

REQUEST FOR ADMISSION NO. 2:

Admit that You mined raw asbestos from a mine at King City, California.

RESPONSE TO REQUEST FOR ADMISSION NO. 2:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Denied that Union Carbide's mine was in King City, CA. The mine was approximately 50 miles from King City.

REQUEST FOR ADMISSION NO. 3:

Admit that You sold raw asbestos between 1964 and 1985.

RESPONSE TO REQUEST FOR ADMISSION NO. 3:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Admitted that Union Carbide sold during that time frame raw asbestos, in pelletized and fibrous form. The asbestos was not sold to the general public or to "end users." It was sold to manufacturers for use in their products and production processes.

REQUEST FOR ADMISSION NO. 4:

Admit that You sold raw asbestos mined from King City, California between 1964 and 1985.

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for Ad... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 4 of 29 asbestosclaims.law/library/19669/4

RESPONSE TO REQUEST FOR ADMISSION NO. 4:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Admitted in part. Union Carbide sold asbestos milled in its King City, CA mill between 1964 and 1985. The asbestos was mined approximately 50 miles away.

REQUEST FOR ADMISSION NO. 5:

Admit that You sold raw asbestos to Georgia-Pacific Corporation.

RESPONSE TO REQUEST FOR ADMISSION NO. 5:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968.

REQUEST FOR ADMISSION NO. 6:

Admit that you sold raw asbestos fiber to Georgia-Pacific Corporation in 1968.

RESPONSE TO REQUEST FOR ADMISSION NO. 6:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968.

REQUEST FOR ADMISSION NO. 7:

Admit that You sold raw asbestos fiber to Georgia-Pacific Corporation for use in Georgia-Pacific Corporation joint compounds.

RESPONSE TO REQUEST FOR ADMISSION NO. 7:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad and not reasonably calculated to lead to the

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for Ad... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 5 of 29 asbestosclaims.law/library/19669/5

discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows: Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968.

REQUEST FOR ADMISSION NO. 8:

Admit that You sold raw asbestos fiber to United States Gypsum Company.

RESPONSE TO REQUEST FOR ADMISSION NO. 8:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968.

REQUEST FOR ADMISSION NO. 9:

Admit that You sold raw asbestos fiber to United States Gypsum Company in 1968.

RESPONSE TO REQUEST FOR ADMISSION NO. 9:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968.

REQUEST FOR ADMISSION NO. 10:

Admit that You sold raw asbestos fiber to United States Gypsum Company for use in United States Gypsum Company joint compounds.

RESPONSE TO REQUEST FOR ADMISSION NO. 10:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad, vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows: Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968.

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for Ad... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 6 of 29 asbestosclaims.law/library/19669/6

REQUEST FOR ADMISSION NO. 11:

Admit that You sold raw asbestos fiber to United States Gypsum Company for use in USG joint compound.

RESPONSE TO REQUEST FOR ADMISSION NO. 11:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows: Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968.

REQUEST FOR ADMISSION NO. 12:

Admit that You sold raw asbestos fiber to United States Gypsum Company for use in Durabond joint compound.

RESPONSE TO REQUEST FOR ADMISSION NO. 12:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968.

REQUEST FOR ADMISSION NO. 13:

Admit that You sold raw asbestos fiber to Proko Industries, Inc.

RESPONSE TO REQUEST FOR ADMISSION NO. 13:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide additionally objects to this Request on the grounds of relevance in that it seeks information about a product manufacturer to whose products plaintiff never claimed exposure. Subject to its objections, Union Carbide responds as follows: Denied as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including 1968.

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for Ad... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 7 of 29 asbestosclaims.law/library/19669/7

REQUEST FOR ADMISSION NO. 14:

Admit that You sold raw asbestos fiber to Proko Industries for use in Proko Industries joint compounds.

RESPONSE TO REQUEST FOR ADMISSION NO. 14:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide additionally objects to this Request on the grounds of relevance in that it seeks information about a product manufacturer to whose products plaintiff never claimed exposure. Subject to its objections, Union Carbide responds as follows: Denied as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including 1968.

REQUEST FOR ADMISSION NO. 15:

Admit that You sold raw asbestos fiber to National Gypsum Company.

RESPONSE TO REQUEST FOR ADMISSION NO. 15:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968.

REQUEST FOR ADMISSION NO. 16:

Admit that You sold raw asbestos fiber to National Gypsum Company in 1968.

RESPONSE TO REQUEST FOR ADMISSION NO. 16:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968.

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for Ad... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 8 of 29 asbestosclaims.law/library/19669/8

REQUEST FOR ADMISSION NO. 17:

Admit that You sold raw asbestos fiber to National Gypsum Company for use in National Gypsum Company joint compounds.

RESPONSE TO REQUEST FOR ADMISSION NO. 17:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968.

REQUEST FOR ADMISSION NO. 18:

Admit that You sold raw asbestos fiber to National Gypsum Company for use in Gold bond joint compound.

RESPONSE TO REQUEST FOR ADMISSION NO. 18:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968.

REQUEST FOR ADMISSION NO. 19:

Admit that You sold raw asbestos fiber to Kelly-Moore Paint Company, Inc.

RESPONSE TO REQUEST FOR ADMISSION NO. 19:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968.

REQUEST FOR ADMISSION NO. 20:

Admit that You sold raw asbestos fiber to Kelly-Moore Paint Company, Inc. in 1968.

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for Ad... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 9 of 29 asbestosclaims.law/library/19669/9

RESPONSE TO REQUEST FOR ADMISSION NO. 20:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968.

REQUEST FOR ADMISSION NO. 21:

Admit that You sold raw asbestos fiber to Kelly-Moore Paint Company, Inc. for use in Kelly-Moore Paint Company, Inc. joint compounds.

RESPONSE TO REQUEST FOR ADMISSION NO. 21:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968.

REQUEST FOR ADMISSION NO. 22:

Admit that You sold raw asbestos fiber to Kelly-Moore Paint Company, Inc. for use in PACO joint compound.

RESPONSE TO REQUEST FOR ADMISSION NO. 22:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad, vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows: Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968.

REQUEST FOR ADMISSION NO. 23:

Admit You sold, raw asbestos fiber to Kelly-Moore Paint Company, Inc. for use in PACO quick set joint compound.

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for A... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 10 of 29 asbestosclaims.law/library/19669/10

RESPONSE TO REQUEST FOR ADMISSION NO. 23:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad, vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows: Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968.

REQUEST FOR ADMISSION NO. 24:

Admit that, from September 1970 to May 1977, all joint compounds manufactured by Georgia-Pacific Corporation contained raw asbestos fiber supplied by You.

RESPONSE TO REQUEST FOR ADMISSION NO. 24:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Denied.

REQUEST FOR ADMISSION NO. 25:

Admit that the trade name of the raw asbestos fiber that you sold between 1964 and 1985 was known as Calidria.

RESPONSE TO REQUEST FOR ADMISSION NO. 25:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad, vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows: Admitted in part. Union Carbide sold its asbestos initially as "Union Carbide Asbestos" and then under the name "Calidria". Union Carbide's asbestos was given other trade names by some distributors.

REQUEST FOR ADMISSION NO. 26:

Admit that the raw asbestos fiber you sold between 1964 and 1985 was referred to by You as a short fiber Chrysotile.

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for A... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 11 of 29 asbestosclaims.law/library/19669/11

RESPONSE TO REQUEST FOR ADMISSION NO. 26:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows: Admitted. Calidria consisted of raw chrysotile asbestos in a unique short-fiber formulation which Union Carbide mined near King City, California.

REQUEST FOR ADMISSION NO. 27:

Admit that You represented to your raw asbestos fiber customers that your raw asbestos fiber was safer than other forms of asbestos fiber.

RESPONSE TO REQUEST FOR ADMISSION NO. 27:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows: Denied.

Union Carbide advised its customers to take precautions applicable to the use of any asbestos fibers. See Calidria's brochure (1968) a true and correct copy of which is attached hereto as Exhibit "A".

Calidria was mined from a deposit which consisted of a unique form of chrysotile. As a result of its unique properties, Calidria could not pose the dangers which might be created by asbestos from other deposits. Those properties include the following: Calidria's short fiber length (shorter than any other known chrysotile); the Calidria deposit's lack of tremolite contamination; Calidria's quick dissolution due to the "weak" fibril structure; and its width and shape. Many of Union Carbide's expert witnesses can testify as to the unique properties of the Calidria fiber and resulting innocuous biological impact of Calidria.

In spite of the unique, innocuous nature of the Calidria fiber, Union Carbide has long recognized the desirability of avoiding excessive exposure to dust from any source. Union Carbide took steps to enable customers to minimize or avoid the creation of and exposure to dust from Calidria.

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for A... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 12 of 29 asbestosclaims.law/library/19669/12

During the early days of Union Carbide's Calidria business, medical and industrial health officials at Union Carbide issued asbestos toxicology reports which were distributed to sales and other appropriate personnel. Warning labels were added to Calidria packages in 1968 and toxicological information first appeared in sales literature in that year. Material Safety Data Sheets were mailed to Calidria customers beginning in 1972. AIA/NA information pamphlets were made available to customers starting in 1972 and were mailed to customers beginning in 1977 at the latest.

The health and safety literature made available and disseminated by Union Carbide to its Calidria customers warned of possible serious adverse health effects associated with the excessive inhalation of asbestos fiber, advised customers on ways to control or avoid such hazards, including the use of respirators as a way to avoid the hazards. In addition to the dissemination of health and safety information, Union Carbide took active steps to help insure that Calidria was handled and used in a clean and safe manner and environment: Union Carbide employed shrink-wrap, tight-fitting packaging to prevent leakage, spillage, or dust emission during the shipment of Calidria. Union Carbide also developed pelletized forms of Calidria which would reduce dust emission. In 1972, Union Carbide offered to take dust counts of the premises of Calidria 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. Harrison Rhodes, an industrial hygienist, supervised Union Carbide's dust monitoring program.

REQUEST FOR ADMISSION NO. 28:

Admit that You represented to Georgia-Pacific Corporation that your raw asbestos fiber was safer then other types of raw asbestos fiber.

RESPONSE TO REQUEST FOR ADMISSION NO. 28:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for A... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 13 of 29 asbestosclaims.law/library/19669/13

responds as follows: See Response to Request for Admission No. 27, including all objections asserted therein.

REQUEST FOR ADMISSION NO. 29:

Admit that You advised Georgia-Pacific Corporation that your raw asbestos fiber was safer than other types of raw asbestos fiber.

RESPONSE TO REQUEST FOR ADMISSION NO. 29:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. See Union Carbide's Response to Request for Admission No. 27, including all objections asserted therein.

REQUEST FOR ADMISSION NO. 30:

Admit that You represented to United States Gypsum Company that your asbestos fiber was safer than other types of raw asbestos fiber.

RESPONSE TO REQUEST FOR ADMISSION NO. 30:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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 Response to Request for Admission No. 27, including all objections asserted therein.

REQUEST FOR ADMISSION NO. 31:

Admit that You advised United States Gypsum Company that your asbestos fiber was safer than other types of raw asbestos fiber.

RESPONSE TO REQUEST FOR ADMISSION NO. 31:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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 Response to Request for Admission No. 27, including all objections asserted therein.

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for A... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 14 of 29 asbestosclaims.law/library/19669/14

REQUEST FOR ADMISSION NO. 32:

Admit that You represented to Proko Industries that your raw asbestos fiber was safer than other types of raw asbestos fiber.

RESPONSE TO REQUEST FOR ADMISSION NO. 32:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide additionally objects to this Request on the grounds of relevance in that it seeks information about a product manufacturer to whose products plaintiff never claimed exposure. Subject to its objections, Union Carbide responds as follows: Denied as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including 1968. See also Union Carbide's Response to Request for Admission No. 27, including all objections asserted therein.

REQUEST FOR ADMISSION NO. 33:

Admit that You advised Proko Industries that your raw asbestos fiber was safer than other types of raw asbestos fiber.

RESPONSE TO REQUEST FOR ADMISSION NO. 33:

See General Objections Nos. 1, 2, and 4. Union Carbide further objects to this Request on the grounds that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide additionally objects to this Request on the grounds of relevance in that it seeks information about a product manufacturer to whose products plaintiff never claimed exposure. Subject to its objections, Union Carbide responds as follows: Denied as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including 1968. See also Union Carbide's Response to Request for Admission No. 27, including all objections asserted therein.

REQUEST FOR ADMISSION NO. 34:

Admit that You represented to National Gypsum Company that your raw asbestos fiber was safer than other types of raw asbestos fiber.

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for A... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 15 of 29 asbestosclaims.law/library/19669/15

RESPONSE TO REQUEST FOR ADMISSION NO. 34:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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 Response to Request for Admission No. 27, including all objections asserted therein.

REQUEST FOR ADMISSION NO. 35:

Admit that You advised National Gypsum Company that your raw asbestos fiber was safer than other types of raw asbestos fiber.

RESPONSE TO REQUEST FOR ADMISSION NO. 35:

See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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 Response to Request for Admission No. 27, including all objections asserted therein.

REQUEST FOR ADMISSION NO. 36:

Admit that You represented to Kelly-Moore Paint Company, Inc. that your raw asbestos fiber was safer than other types of raw asbestos fiber.

RESPONSE TO REQUEST FOR ADMISSION NO. 36:

Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such additional discovery is necessary, not harassing or overly burdensome. See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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 Response to Request for Admission No. 27, including all objections asserted therein.

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for A... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 16 of 29 asbestosclaims.law/library/19669/16

REQUEST FOR ADMISSION NO. 37:

Admit that You advised Kelly-Moore Paint Company, Inc. that your raw asbestos fiber was safer than other forms of raw asbestos fiber.

RESPONSE TO REQUEST FOR ADMISSION NO. 37:

Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such additional discovery is necessary, not harassing or overly burdensome. See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Denied for use in joint compound as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including September 1968. See Union Carbide's Response to Request for Admission No. 27, including all objections asserted therein.

REQUEST FOR ADMISSION NO. 38:

Admit that You received a copy of the 1966 study by the Chemical Hygiene Fellowship of Mellon Institute which addressed the potential of your raw asbestos fiber to cause fibrosis.

RESPONSE TO REQUEST FOR ADMISSION NO. 38:

Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for Additional Discovery pursuant tc *Code of Civil Procedure* section 2033 which details why such additional discovery is necessary, not harassing or overly burdensome. See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide additionally objects on the grounds that the Request is vague in that no timeframe is provided for when the 1966 study was received by Union Carbide. Subject to its objections, Union Carbide responds as follows: Denied as stated; admitted that Union Carbide received a

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for A... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 17 of 29 asbestosclaims.law/library/19669/17

copy of a 1966 memo styled: "The Fibrogenic Potential of Asbestos Products via Intraperitoneal Injection in Guinea Pigs, Rats and Rabbits and by the Intratracheal Route in the Rat."

REQUEST FOR ADMISSION NO. 39:

Admit that You received the 1966 study by the Chemical Hygiene Fellowship of Mellon Institute which addressed the potential of your raw asbestos fiber to cause fibrosis in 1966.

RESPONSE TO REQUEST FOR ADMISSION NO. 39:

Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such additional discovery is necessary, not harassing or overly burdensome. See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Denied as stated; admitted that Union Carbide received in 1966 a copy of a memo styled: "The Fibrogenic Potential of Asbestos Products via Intraperitoneal Injection in Guinea Pigs, Rats and Rabbits and by the Intratracheal Route in the Rat."

REQUEST FOR ADMISSION NO. 40:

Admit that You received a copy of the 1966 study by the Chemical Hygiene Fellowship of Mellon Institute regarding the potential of your raw asbestos fiber to cause fibrosis before you ceased selling raw asbestos fiber.

RESPONSE TO REQUEST FOR ADMISSION NO. 40:

Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such additional discovery is necessary, not harassing or overly burdensome. See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide additionally objects on the grounds that the Request is vague in that no timeframe is

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for A... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 18 of 29 asbestosclaims.law/library/19669/18

provided for when the 1966 study was received by Union Carbide. Subject to its objections, Union Carbide responds as follows: See Union Carbide's Responses to Requests for Admission Nos. 3 and 39, including all objections asserted therein.

REQUEST FOR ADMISSION NO. 41:

Admit that You commissioned the study by the Chemical Hygiene Fellowship of Mellon Institute.

RESPONSE TO REQUEST FOR ADMISSION NO. 41:

Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such additional discovery is necessary, not harassing or overly burdensome. See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad, vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows: Admitted if the study referred to in this Request is the same as the one referred to in Request No. 40.

REQUEST FOR ADMISSION NO. 42:

Admit that, between 1964 and 1985, you performed animal testing studies on the raw asbestos fiber that you sold.

RESPONSE TO REQUEST FOR ADMISSION NO. 42:

Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such additional discovery is necessary, not harassing or overly burdensome. See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request 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: Admitted in part and denied in part. See Union Carbide's Responses to Request for Admissions Nos. 38-41, including all objections asserted therein.

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for A... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 19 of 29 asbestosclaims.law/library/19669/19

REQUEST FOR ADMISSION NO. 43:

Admit that You, between 1964 and 1985, you learned through animal testing studies that the raw asbestos fiber had an equal or greater potential to cause fibrosis than other forms of raw asbestos fiber than commercially available.

RESPONSE TO REQUEST FOR ADMISSION NO. 43:

Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such additional discovery is necessary, not harassing or overly burdensome. See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad, vague, ambiguous, assumes facts not in evidence and is 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 Request for Admissions Nos. 38-42, including all objections asserted therein.

REQUEST FOR ADMISSION NO. 44:

Admit that, between 1964 and 1985, you learned that the raw asbestos fiber you sold was an equal or more potent carcinogen than other forms of raw asbestos fiber than commercially-available.

RESPONSE TO REQUEST FOR ADMISSION NO. 44:

Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such additional discovery is necessary, not harassing or overly burdensome. See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad, vague, ambiguous, 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 Request for Admissions Nos. 38-42, including all objections asserted therein.

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for A... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 20 of 29 asbestosclaims.law/library/19669/20

REQUEST FOR ADMISSION NO. 45:

Admit that despite receiving the results of animal testing on your raw asbestos fiber, you continued to supply raw asbestos fiber until 1985.

RESPONSE TO REQUEST FOR ADMISSION NO. 45:

Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such additional discovery is necessary, not harassing or overly burdensome. See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly broad, vague, ambiguous, assumes facts not in evidence and is 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 Request for Admissions Nos. 3 & 38-42, including all objections asserted therein.

Dated: March 25, 2002

Respectfully submitted,

McKENNA & CUNEO, L.L.P.

By _____
William J. Sayers
Farah S. Nicol
Susan Weisenberg Gilefsky

Attorneys for Defendant
UNION CARBIDE CORPORATION
(formerly known as Union Carbide Chemicals and Plastics Company, Inc.)

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for A... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 21 of 29 asbestosclaims.law/library/19669/21

EXHIBIT "A"

17085919.1

THE DISCOVERY COMPANY

Please note that this is dated October 1968. JM 1/22/14

Calidria ASBESTOS

"CALIDRIA" ASBESTOS SG-130 AND SG-210
For Tape Joint Compounds

File H-1

Lowers Costs Two Ways

CALIDRIA Asbestos acts as a bodying and secondary thickening agent permitting formulation of lower density, more economical tape joint compounds without the sacrifice of performance. CALIDRIA Asbestos is produced by a proprietary manufacturing process that yields unusually high fiber content and more complete fiber liberation from the natural bundles. As a result, CALIDRIA Asbestos goes up to twice as far, pound for pound, as commercial grades of asbestos containing large amounts of other filler materials that have no specific desirable effects on tape joint compound properties.

Reduces Cracking

The fibers of CALIDRIA Asbestos behave as an active lyophobic colloid in aqueous dispersion; by this mechanism CALIDRIA Asbestos increases tape joint compound liquid cohesive strength during drying. Increased liquid cohesive strength greatly reduces the tendency for cracks over nail holes, in thick sections at the center of the joint, and along the feathered edges.

Enhances Sandability

CALIDRIA Asbestos contains mainly chrysotile fiber and is essentially free from abrasive contaminants, such as magnetite and serpentine rock dust. This composition results in a low density product, free from contaminants that interfere with sanding.

Improves Uniformity

Narrow and well-controlled particle size distribution, low alkalinity and high brightness are characteristic of CALIDRIA Asbestos. These properties are consistent from batch to batch and improve the uniformity of tape joint compounds using CALIDRIA Asbestos.

Suggestions for Use of CALIDRIA Asbestos

CALIDRIA Asbestos can be readily used in your present tape joint compound formulation. Add approximately one-half the proportion of asbestos you now use. Increase the proportion of calcium carbonate or other inert filler to make up for the lower quantity of asbestos. You may also be able to use slightly more water in your ready-mix and maintain your present viscosity level. No other changes in your

October, 1968
F-42258

CALIDRIA, CELLOSIZE, UCAR, and UNION CARBIDE are trade marks of Union Carbide Corporation.

UNION CARBIDE CORPORATION • CHEMICALS AND PLASTICS • 270 PARK AVENUE, N.Y., N.Y. 10

Suggestions for Use of CALIDRIA Asbestos (Continued)

formulation or manufacturing procedure are required.

CALIDRIA Asbestos SG-130 has the coarser particle size; it finds use for bedding compounds or perhaps spackling compound. The SG-210 has the finer particle size and is favored for topping compounds, all-purpose compositions, texture paints, and similar formulas.

A Suggested Ready-Mix Tape Joint Compound For Use With CALIDRIA Asbestos

	Parts by Weight Dry Basis
Fillers:	
Calcium Carbonate, No. 1 White (Thompson Weinman)	61.42
Mica, P80F (Western Mica)	21.00
Clay, ASP-400 (Minerals and Chemicals Philipp Corp.)	4.00
CALIDRIA Asbestos, SG-210 (Union Carbide)	4.58
Binder:	
UCAR Latex 131 (Union Carbide)	6.60*
Workability Control Agent:	
CELLOSIZE Thickener, TJC Grade (Union Carbide)	0.50
Drying Control:	
Ethylene Glycol (Union Carbide)	1.00
Defoamer:	
"Nopco" PD-1 (Nopco Chemical Company)	0.10
Dispersant:	
"Daxad" 30 (Dewey & Almy Chemical Div.)	0.60*
Bacteriastat:	
"Dowicide" A (Dow Chemical Co.)	0.20
	100.00

Total Water: about 56 parts by weight per 100 parts dry solids

*Contained solids basis

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for A... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 24 of 29 asbestosclaims.law/library/19669/24

Typical Product Characteristics

	CALIDRIA Asbestos	
	SG-130	SG-210
Reflectance (G.E. Photovolt)	68%	
Contained magnetite	2% max.	
Alkalinity (as % of Na_2O)	0.05 to 0.06	
pH (5% aqueous slurry)	8.5 to 9.5	
Surface area (BET)	50 to 60 m^2/g.	
Oil Adsorption (DOP #/100# asbestos)	90 to 100	110 to 120
Wet Bulk, settled vol. (ml.) 10g/250 ml./1 hr.	200	220
Dry Bulk (#/ft.^{3})	7 to 8	5 to 6
Water absorption (wt. % in filter cake)	55 to 60	62 to 65
Size distribution (cumulative % retained)		
Wet Screen mesh size		
100	5	Trace
200	17	3
325	28 to 32	10 to 15

Packaging and Shipping Information

Product Form – Opened (finely ground) chrysotile asbestos fiber.

Packaging –

	CALIDRIA Asbestos	
	SG-130	SG-210
	40 lb.	30 lb.
One Package	1,600 lb.	1,050 lb.
Pallet Weight	2,000 lb.	1,500 lb.
Carload		
Truckload		

Shipping –
Classification – asbestos shorts
Rail point of origin – Welby, California (King City, California)

TOXICOLOGICAL PROPERTIES

It has been known for many years that some persons working in asbestos production were prone to develop a disabling lung disease. In time, this condition became known as asbestosis and was related to exposure to high concentrations of asbestos dust. With further experience, it was found that men could work with asbestos without development of lung disease if dust concentrations were kept below a certain level. It is now generally accepted that a man can work a 40-hour week for a lifetime without developing asbestosis if the asbestos dust particle count is kept at or below 5 million particles per cubic foot of air. This dust concentration of 5 million particles per cubic foot of air is the Threshold Limit Value for asbestos, and no cases

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for A... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 25 of 29 asbestosclaims.law/library/19669/25

TOXICOLOGICAL PROPERTIES (Continued)

of asbestosis are believed to have occurred when exposures have been maintained at or below this level, despite large-scale utilization (now approaching one million tons per year in the U.S.A.). This concentration of dust is generally not visible in the average work area unless a beam of light causing a Tyndall effect is present. Usually the dust concentration must be from 8-10 million particles per cubic foot before its presence is visible in average lighting conditions.

Several years ago, it was reported that there was an increase in the incidence of cancerous tumors, especially of the lung, associated with asbestosis. Recently there have been reports of some cancers occurring in individuals exposed to asbestos dust, but who have not developed clinical asbestosis. It is believed by most authorities that these cases have been associated with exposures significantly exceeding the Threshold Limit Value. A major manufacturer of asbestos products who also mines asbestos has not been able to show an increase in cancerous growths in men working where dust concentrations were maintained at the Threshold Limit Value.

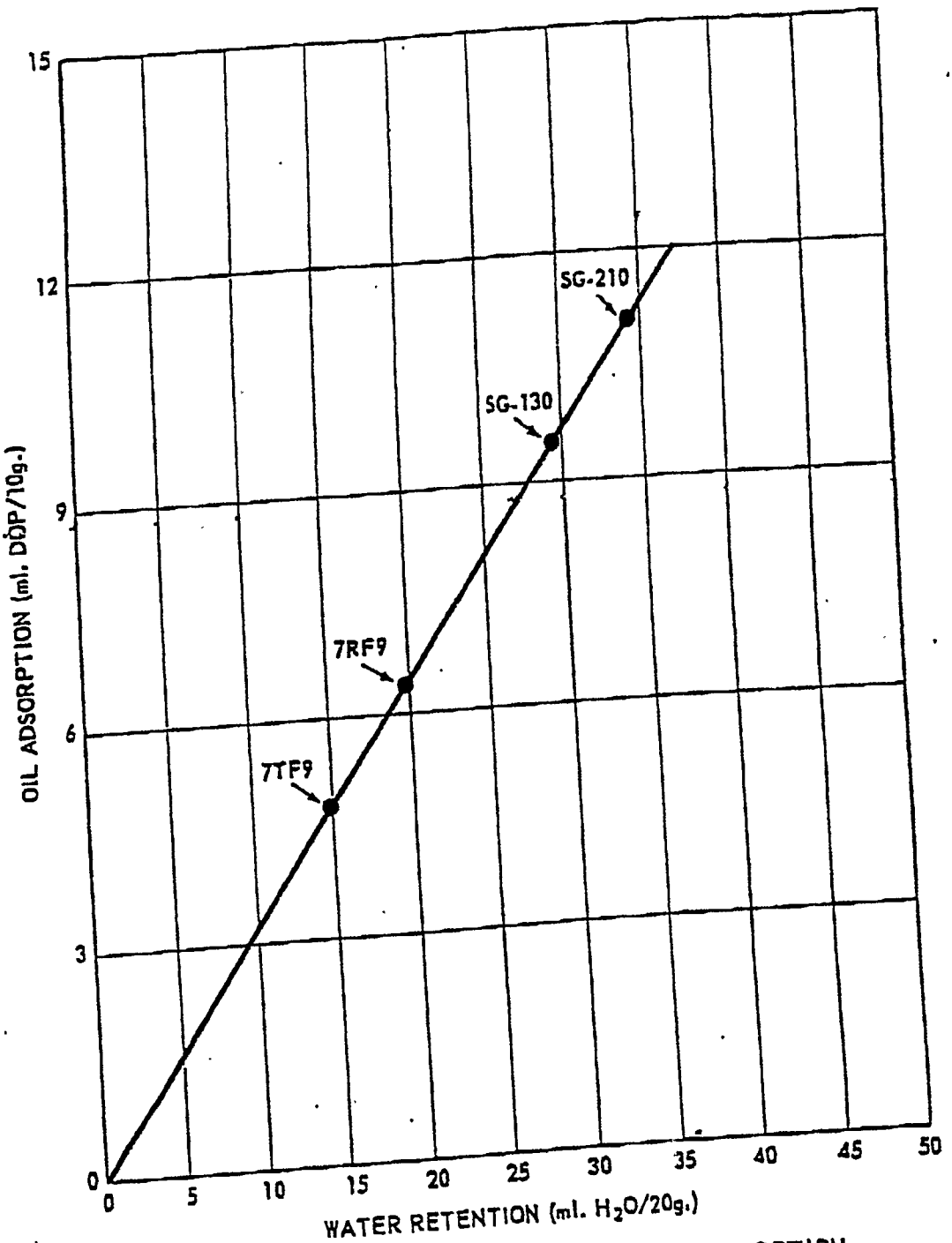
Control of asbestos dust exposure is therefore necessary. The control methods are the standard ones applicable to a variety of dusty operations. They include closed flow systems, wet processes where possible, and adequate exhaust ventilation where openings in the system are necessary. Pelletizing is sometimes used to improve the handling characteristics of otherwise dusty materials. Where satisfactory containment to stay within the Threshold Limit Value is impractical or impossible, efficient and reliable respirators are available for the protection of the employee. A program of environmental monitoring in manufacturing operations is highly desirable to determine that Threshold Limit Values are not being exceeded. Employees should wear respirators where dusting occurs in finishing products such as sanding taped joints.

Pre-employment and periodic physical examinations of workers are desirable. These should include chest X-rays to insure that the worker has no chest condition prior to work with asbestos and to determine that no lung changes are resulting from work with asbestos.

In conclusion, while asbestos dust in excess of the Threshold Limit Value is potentially harmful, as are many other dusts encountered in industry, it is as readily controlled as other such dusts and it can be used safely with appropriate precautions.

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for A... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 26 of 29 asbestosclaims.law/library/19669/26

"CALIDRIA" ASBESTOS SG-130 AND SG-210
For Tape Joint Compounds



RELATIONSHIP BETWEEN WATER & OIL ADSORPTION
CAPACITY OF SOME ASBESTOS PRODUCTS
FOR TAPE JOINT ADHESIVE FORMULATIONS

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for A... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 27 of 29 **asbestosclaims.law/library/19669/27**

UNION CARBIDE

THE DISCOVERY COMPANY

UNION CARBIDE CORPORATION
CHEMICALS AND PLASTICS
270 PARK AVENUE, NEW YORK, N.Y. 10017

Sales Offices

United States

ATLANTA, GEORGIA 30309	1371 Peachtree St., N. E.	404-892-7500
BALTIMORE, MARYLAND 21207	Beltway Bldg., 6707 Whitestone Rd.	301-944-8211
BOSTON, MASSACHUSETTS 02194	300 First Ave., Needham Hgts.	617-444-5400
BUFFALO, NEW YORK 14225	3343 Harlem Rd.	716-837-6450
CHARLOTTE, NORTH CAROLINA 28210	6230 Fairview Rd.	704-364-1400
CHICAGO, ILLINOIS 60606	120 South Riverside Plaza	312-822-7000
CINCINNATI, OHIO 45227	West Street and Madisonville Rd.	513-272-0206
CLEVELAND, OHIO 44114	1300 Lakeside Ave., N.E.	216-621-4202
CLIFTON, NEW JERSEY 07012	935 Allwood Rd.	201-778-2900
DALLAS, TEXAS 75207	2710 Stemmons Freeway	214-631-0010
DETROIT, MICHIGAN 48221	10421 West Seven Mile Rd.	313-341-3131
HARTFORD, CONNECTICUT 06103	410 Asylum St.	203-525-9345
HOUSTON, TEXAS 77027	3839 West Alabama Ave.	713-621-1000
INDIANAPOLIS, INDIANA 46220	720 Broad Ripple Ave.	317-255-3181
KANSAS CITY, MISSOURI 64141	910 Baltimore Ave.	816-221-2400
LOS ANGELES, CALIFORNIA 90058	2770 Leonis Blvd.	213-583-3081
MEMPHIS, TENNESSEE 38116	3385 Airways Blvd.	901-396-5375
MINNEAPOLIS, MINNESOTA 55416	3033 Excelsior Blvd.	612-927-4221
MOORESTOWN, NEW JERSEY 08057	Route 38 and Pleasant Valley Rd.	609-235-6200
NEW YORK, NEW YORK 10017	270 Park Ave.	212-551-4641
PHILADELPHIA (MOORESTOWN, NEW JERSEY SALES OFFICE)		215-923-3200
PITTSBURGH, PENNSYLVANIA 15220	Pkway Center, 875 Greentree Rd.	412-922-5700
ST. LOUIS, MISSOURI 63105	10 South Brentwood Blvd.	314-726-0324
SAN FRANCISCO, CALIFORNIA 94106	22 Battery St.	415-982-1360
SEATTLE, WASHINGTON 98118	4726 Rainier Ave., South	206-723-8660
TULSA, OKLAHOMA 74114	2901 South Harvard	918-742-5524

Affiliates

Pan America

ARGENTINA	Union Carbide Inter-America, Inc., Buenos Aires
BRAZIL	Union Carbide do Brasil S. A., Sao Paulo, Rio de Janeiro
CANADA	Union Carbide Canada Ltd., Calgary, Lachine (P.Q.), Toronto, Vancouver, Winnipeg
CARIBBEAN	Union Carbide Inter-America, Inc., San Juan, Puerto Rico
CENTRAL AMERICA	Union Carbide Inter-America, Inc., Panama City, Panama
CHILE	Union Carbide Comercial Chile Ltd., Santiago
COLOMBIA	Union Carbide Colombia, S. A., Bogota
MEXICO	Unicarb Comercial, S. A. de C. V., Mexico, D. F., Guadalajara, Monterrey
PERU	Union Carbide Inter-America, Inc., Lima
VENEZUELA	Union Carbide de Venezuela, C. A., Caracas
WESTERN HEMISPHERE	Union Carbide Inter-America, Inc., New York, N. Y.

Eastern

AUSTRALIA	Union Carbide Australia Ltd., Sydney, N. S. W.
HONG KONG	Union Carbide Asia Ltd., Hong Kong
INDIA	Union Carbide India Ltd., Calcutta, Bombay, Madras, New Delhi
NEW ZEALAND	Union Carbide New Zealand (Pty) Ltd., Auckland
PAKISTAN	National Carbon Co. (Pakistan) Ltd., Karachi
PHILIPPINES	Union Carbide Philippines Inc., Manila
SINGAPORE	Union Carbide Singapore Ltd., Singapore

Europe
Middle East and North Africa

AUSTRIA	Union Carbide Austria Ges. mbH., Vienna
BELGIUM	Union Carbide Belgium N. V., Brussels
FRANCE	Union Carbide Europe s.a., Succursale Francaise, Puteaux-Paris
GERMANY	Union Carbide Deutschland, GmbH, Dusseldorf
ITALY	Union Carbide Italia S.p.A., Milan
MIDDLE EAST	Union Carbide Middle East Ltd., Athens, Greece
NETHERLANDS	Union Carbide Belgium N. V., Amsterdam
SCANDINAVIA	Union Carbide Norden A.B., Stockholm, Sweden
SPAIN	Union Carbide Iberica S. A., Madrid
SWITZERLAND	Union Carbide Europe s.a., Geneva
UNITED KINGDOM	Union Carbide U. K. Limited, London, Manchester, Rickmansworth, England

Africa

AFRICA (EAST)	Union Carbide Africa Ltd., Nairobi, Kenya
AFRICA (SOUTH)	Union Carbide South Africa (Pty) Ltd., Johannesburg, Capetown, Durban, Republic of South Africa

Lithographed in U.S.A.

Published by AsbestosClaims.Law
asbestosclaims.law/library/19669/28

VERIFICATION

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

EDWARD W. DeBOR, being duly sworn, deposes and says: that he is Union Carbide Corporation's Assistant Manager, Vermont Records; that over the past years, he participated in collecting Union Carbide's asbestos-related documents for inclusion in the asbestos-related Document Repository maintained in the offices of Kelley, Drye & Warren, LLP, Union Carbide's national coordinating counsel for asbestos-related matters; that no single employee or former employee of Union Carbide (including deponent) has knowledge or information regarding all of the information set forth in the attached discovery responses; that the attached amended responses to Plaintiff's Request for Admissions (Set One) were assembled and prepared by counsel for Union Carbide based upon the documents contained in the Document Repository and upon information obtained by counsel from current and former employees of Union Carbide.

Edward W. DeBor
Assistant Manager, Vermont Records

Sworn to before me this 25th day of
March, 2002

Notary Public

SIOBHAN A. HANDLEY
Notary Public, State of New York
No. 02HA5066891
Qualified in New York County
Commission Expires Jan. 13, 2003

NY01/JANGM/700899.1

Union Carbide trial exhibit UC-5184: Union Carbide Corporation's Amended Responses to Plaintiff's Request for A... Published by AsbestosClaims.Law
ACL Doc 19669 · Page 29 of 29 asbestosclaims.law/library/19669/29