PLAINTIFF'S EXHIBIT
UC-5327

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UNION CARBIDE CORPORATION

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF

IN RE: SHIPYARD AND APPLICATOR CASES (CLAPPER & BRAYTON) CONSOLIDATED FOR DISCOVERY	No. 804416 UNION CARBIDE CORPORATION'S RESPONSES TO SET OF INTERROGATORIES PROPOUNDED BY PLAINTIFFS (No. 28)

PROPOUNDING PARTY: PLAINTIFFS

RESPONDING PARTY: UNION CARBIDE CORPORATION, Defendant

SET NUMBER: Twenty-eight

Defendant UNION CARBIDE CORPORATION ("Union Carbide") Responds To Plaintiffs' Interrogatories to Defendants (Set No. 28) as follows:

GENERAL STATEMENTS AND OBJECTIONS

1. Union Carbide states that trial preparation and factual investigation in these matters are ongoing. Union Carbide's answers to these interrogatories are based on

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Attorneys for Defendant
UNION CARBIDE CORPORATION

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ALAMEDA

IN RE DISCOVERY AND PRETRIAL MATTERS FOR RELATED ASBESTOS CASES (LAW OFFICES OF JACK K. CLAPPER) Plaintiffs, GAF CORPORATION; GEORGIA-PACIFIC CORPORATION; KAISER CEMENT CORPORATION/KAISER GYPSUM COMPANY, INC.; KELLY-MOORE PAINT COMPANY, INC.; NICOLET, INC.; PLANT INSULATION COMPANY; RAYMARK INDUSTARIES, INC.; THE SYNKOLOID COMPANY; WESTERN MACARTHUR COMPANY; W.R. GRACE, INC.; ACandS, INC.; ARMSTRONG WORLD INDUSTRIES, INC.; BLUE DIAMOND CORPORATION; THE CELOTEX CORPORATION; CERTAINTEED CORPORATION; EAGLE-PICHER INDUSTRIES, INC.; FIBREBOARD CORPORATION; FLEXITALLIC GASKET COMPANY; FLINTKOTE COMPANY; H.K. PORTER COMPANY, INC.; KEENE CORPORATION; NATIONAL GYPSUM COMPANY; OWENS-CORNING FIBERGLAS CORPORATION; OWENS-ILLINOIS, INC.; PITTSBURGH-CORNING CORPORATION; TURNER & NEWALL PLC; UNION CARBIDE CORPORATION; UNITED STATES GYPSUM COMPANY; UNIROYAL, INC. Defendants,	NO: 603286-1 (Alameda) 88602 (Solano) RESPONSES BY UNION CARBIDE TO PLAINTIFF'S SET NO. 46 OF INTERROGATORIES

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PROPOUNDING PARTY: Plaintiffs

RESPONDING PARTY: Union Carbide Corporation

SET: 46

TO PLAINTIFFS AND TO THEIR ATTORNEYS OF RECORD:

Defendant Union Carbide Corporation ("Union Carbide") responds as follows to plaintiffs' First Set of Interrogatories.

GENERAL OBJECTIONS

1. Union Carbide objects to plaintiffs' First Set of Interrogatories in their entirety on the grounds that they are not reasonably framed in terms of the specific facts and issues involved in the present case. Many of the interrogatories are clearly inappropriate 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.

2. Union Carbide also objects to all interrogatories insofar as they would require the disclosure of information protected by the attorney-client privilege and work product doctrine.

3. Union Carbide objects to providing information about any asbestos-containing product which it has manufactured, sold or distributed on the ground that the asbestos fibers in these products were encapsulated by or embedded in other materials and thus could not be released, or inhaled, and on the grounds that the plaintiff has made no

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allegation of exposure to these products which consist of a tree sprout inhibitor designed primarily to inhibit growth from telephone poles, a phenolic molding compound used as electrical insulation in electronic parts and products such as switches and radios, a thermoplastic molding material used primarily in camera cases, prestone antifreeze, and acetylene cylinder liners. Union Carbide no longer manufactures any of the above products. From 1963 until June 30, 1985, Union Carbide mined and sold short fiber chrysotile asbestos under the trade name Calidria. Union Carbide's only asbestos mine, and source of asbestos for Calidria, was located in or near King City, California. All responses to these interrogatories refer to Calidria asbestos only.

4. Union Carbide objects to all interrogatories in their entirety on the grounds that Union Carbide never imported or exported its Calidria raw asbestos fiber from either the Port of Stockton and/or the Port of Sacramento at any time.

The above general objections are hereby incorporated by reference in Union Carbide's responses to the individual interrogatories below.

INTERROGATORY NO. 1:

State whether you exported any raw asbestos fiber from the Port of Stockton and/or the Port of Sacramento at any time.

RESPONSE TO INTERROGATORY NO. 1:

No, Union Carbide did not export raw asbestos enter through either port at any time.

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INTERROGATORY NO. 2:

Please state for each such year you exported raw asbestos fiber:

a) The locations (including city, dock numbers and pier numbers) from which the raw asbestos fiber was exported;

b) The destinations (including country, state, and city) to which the raw asbestos fiber was exported;

c) The method of transportation used to export the raw asbestos fiber, including:

(i) The name and address of the carrier(s) for each year defendant exported raw asbestos fiber from each location listed in Interrogatory Number 2(a);

(ii) A detailed description of the raw asbestos fiber conveyed to the carrier(s);

(iii) Whether defendant has any documents or writings containing any information regarding defendant's exportation of raw asbestos fiber and the name and address of the custodian of such documents or writings;

(iv) A detailed description of the information such documents or writings contain;

d) The amount in pounds of raw asbestos fiber exported from each location listed in subpart (a) of this interrogatory;

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e) The type (i.e., amosite, chrysotile, crocidolite, etc.) and grade of raw asbestos fiber exported from each such location;

f) The names and locations of the mines which supplied the raw asbestos fiber to defendant which was exported from each such location;

g) The type(s) of packaging used to contain the raw asbestos fiber exported from each such location listed in subpart (a) of this interrogatory, including:

(i) The type of material (i.e., burlap, fabric, paper, plastic, etc.);

(ii) The color of the packaging;

(iii) The dimensions of the packaging;

(iv) The weight of said packaging when packed with raw asbestos fiber;

(v) A detailed description of all writing on the packaging, including the color, size and location of the writing;

(vi) Whether any changes were made in the type of Packaging and dates and reasons for such changes;

h) Whether any entity placed a warning regarding the hazards of inhaling asbestos dust on any such packages of raw asbestos fiber, and if so, state:

(i) The name and address of the entity which placed the warning on such packages;

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(ii) The date when the warning was first placed on such packages;

(iii) The exact wording of the warning;

(iv) The location of the warning;

(v) The size and color of the lettering of the warning;

(vi) All of the facts and circumstances which motivated the placement of such warnings on such packages;

(vii) Whether any changes were made to the wording of the warning, and if so, the precise nature of such changes, the date(s) such changes were made, and the reasons for such changes;

i) The names and addresses of the individuals most knowledgeable about subparts (a) - (h) of this interrogatory;

j) Whether any of the individuals listed in subpart i) of this interrogatory have ever been deposed or testified in lawsuits alleging personal injuries from exposure to asbestos dust, and if so, please list such individuals, and state for each individual the date(s) of deposition or trial testimony, the jurisdiction in which such deposition or trial testimony was given, the style of the case, and the name and address of the plaintiff's attorney;

k) Whether defendant has any writings which contain any of the information sought in any subpart of this interrogatory;

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l) If Your answer to subpart (k) of this interrogatory is "yes":

(i) State the name and address of the custodian of such writings;

(ii) Describe in detail the types of writings you have;

(iii) Describe in detail the contents of each such writing as it pertains to the information requested in this interrogatory;

m) If your answer to subpart (k) of this interrogatory is "no":

i) State whether such writings ever existed;

(ii) If such writings existed, state whether they have been destroyed, and if so, state the name and address ofthe person responsible for destroying them, the reason they were destroyed, the name and address of the custodian of such writings, and describe in detail the contents of such writings.

RESPONSE TO INTERROGATORY NO. 2:

Not applicable.

INTERROGATORY NO. 3:

State whether defendant supplied or sold any raw asbestos fiber to any distributor, supplier, broker or any other entity at any time during the years 1920 to 1985 which then exported said raw asbestos fiber from the port of Stockton

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and/or the port of Sacramento at any time during the years 1920 to 1985.

RESPONSE TO INTERROGATORY NO. 3:

No, Calidria was not shipped through either the port of Stockton or the Port of Sacramento.

INTERROGATORY NO. 4:

Please state for each year that the entity(ies) referred to in Interrogatory Number 3 exported raw asbestos fiber:

a) The name and address of each such entity;

b) The locations (including city, dock numbers and pier numbers) from which the raw asbestos fiber was exported;

c) The destinations (including country, state and city) to which the raw asbestos fiber was exported;

d) The method of transportation used to export the raw asbestos fiber, including:

(i) The name and address of the carrier(s) for each year such entity(ies) exported defendant's raw asbestos fiber from each location listed in Interrogatory number 4(b);

(ii) A detailed description of the raw asbestos fiber conveyed to the carrier(s);

(iii) Whether defendant has any documents or writings containing any information regarding the exportation of raw asbestos fiber referred to in Interrogatory Number 3 and

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the name and address of the custodian of such documents or writings;

(iv) A detailed description of the information such documents or writings contain;

e) The amount in pounds of raw asbestos fiber exported from each location listed in subpart (b) of this interrogatory;

f) The type (i.e., amosite, chrysotile, crocidolite, etc.) and grade of raw asbestos fiber exported from each such location;

g) The names and locations of the mines which supplied the raw asbestos fiber to defendant;

h) The type(s) of packaging used to contain the raw asbestos fiber exported from each location listed in subpart (b) of this interrogatory including:

(i) The type of material, (i.e., burlap, fabric, paper, plastic, etc.);

(ii) The color of the packaging;

(iii) The dimensions of the packaging;

(iv) The weight of said packaging when packed with raw asbestos fiber;

(v) A detailed description of all writing on the packaging, including the color, size and location of the writing;

(vi) Whether any changes were made in the type of Packaging and the dates and reasons for such changes;

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i) Whether any entity placed a warning regarding the hazards of inhaling any asbestos dust on any of such packages of raw asbestos fiber, and, if so, state:

(i) The name and address of the entity which placed the warning on such packages;

(ii) The date when such warning was first Placed on such packages;

(iii) The exact wording of the warning;

(iv) The location of the warning;

(v) The size and color of the lettering of the warning;

(vi) All of the facts and circumstances which motivated the placement of such warnings on such packages;

(vii) Whether any changes were made to the wording of the warning, and if so, the Precise nature of such changes, the date(s) such changes were made, and the reasons for such changes;

j) The names and addresses of the individuals most knowledgeable about subparts (a) - (i) of this interrogatory;

k) Whether any of the individuals listed in subpart (j) of this interrogatory have ever been deposed or testified in lawsuits alleging personal injuries from exposure to asbestos dust, and if so, please list such individuals, and state for each individual the date(s) of deposition or trial testimony, the jurisdiction in which such deposition or trial

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testimony was given, the style of the case, and the name and address of the plaintiff's attorney;

l) Whether defendant or any entity listed in subpart (a) of this interrogatory has any writings which contain any of the information sought in any subpart of this interrogatory;

m) If your answer to subpart (l) of this interrogatory is "yes":

(i) State the name and address of the custodian of such writings;

(ii) Describe in detail the types of writings available;

(iii) Describe in detail the contents of each such writing as it pertains to the information requested in this interrogatory;

n) If your answer to subpart (l) of this interrogatory is "no":

(i) State whether such writings ever existed;

(ii) If such writings existed, state whether they have been destroyed, and if so, state the name and address of the person responsible for destroying them, the reason they were destroyed, the name and address of the custodian of such writings, and describe in detail the contents of such writings.

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RESPONSE TO INTERROGATORY NO. 4:

Not applicable.

INTERROGATORY NO. 5:

State whether you imported any raw asbestos fiber to the Port of Stockton and/or the Port of Sacramento at any time during the years 1920 to 1985.

RESPONSE TO INTERROGATORY NO. 5:

See general objection 3.

INTERROGATORY NO. 6:

Please state for each such year you imported raw asbestos fiber:

a) The locations (including country, state and city) from which the raw asbestos fiber was imported;

b) The destinations (including city, dock number and pier number) to which the raw asbestos fiber was imported;

c) The method of transportation used to import the raw asbestos fiber, including:

(i) The name and address of the carrier(s) for each year defendant imported raw asbestos fiber to each location listed in Interrogatory Number 6(b);

(ii) A detailed description of the raw asbestos fiber conveyed to the carrier(s);

(iii) Whether defendant has any documents or writings containing any information regarding defendant's

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importation of raw asbestos fiber and the name and address of custodian of such documents or writings;

(iv) A detailed description of the information these 81 writings contain;

d) The amount in pounds of raw asbestos fiber imported to each location listed in subpart (b) of this interrogatory;

e) The type (i.e., amosite, chrysotile, crocidolite, etc.) and grade of raw asbestos fiber imported to each location listed in subpart (b) of this interrogatory;

f) The names and locations of the mines which supplied the raw asbestos fiber to defendant which was imported to each such location;

g) The type(s) of packaging used to contain the raw asbestos fiber imported to each such location listed in subpart (b) of this interrogatory, including:

(i) The type of material (i.e., burlap, fabric, paper, plastic, etc.);

(ii) The color of the packaging;

(iii) The dimensions of the packaging;

(iv) The weight of said packages when packed with raw asbestos fiber;

(v) A detailed description of all writing on the packaging, including the color, size and location of the writing;

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(vi) Whether any changes were made in the type of packaging and dates and reasons for such changes;

h) Whether any entity placed a warning regarding the hazards of inhaling asbestos dust on any such packages of raw asbestos fiber, and if so, state:

(i) The name and address of the entity which placed the warning on such Packages;

(ii) The date when the warning was first placed on such packages;

(iii) The exact wording of the warning;

(iv) The location of the warning;

(v) The size and color of the lettering of the warning;

(vi) All of the facts and circumstances which motivated the placement of such warnings on such packages;

(vii) Whether any changes were made to the wording of the warning, and if so, the precise nature of such changes, the date(s) such changes were made, and the reasons for such changes;

i) The names and addresses of the individuals most knowledgable [sic] about subparts (a) - (h) of this interrogatory;

j) Whether any of the individuals listed in subpart i) of this interrogatory have ever been deposed or testified in lawsuits alleging personal injuries from exposure

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to asbestos dust, and if so, please list such individuals, and state for each individual the date(s) of deposition or trial testimony, the jurisdiction in which such deposition or trial testimony was given, the style of the case, and the name and address of the plaintiff's attorney;

k) Whether defendant has any writings which contain any of the information sought in any subpart of this interrogatory;

l) If your answer to subpart (k) of this interrogatorY is "yes";

(i) State the name and address of the custodian of such writings;

(ii) Describe in detail the types of writings you have;

(iii) Describe in detail the contents of each such writing as it pertains to the information requested in this interrogatory;

m) If your answer to subpart (k) of this interrogatory is "no":

(i) State whether such writings ever existed;

(ii) If such writings existed, state whether they have been destroyed, and if so, state the name and address of the person responsible for destroying them, the reason they were destroyed, the name and address of the

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custodian of such writings, and describe in detail the contents of such writings.

RESPONSE TO INTERROGATORY NO. 6:

Not applicable.

INTERROGATORY NO. 7:

State whether you supplied or sold any raw asbestos fiber to any distributor, supplier, broker or any other entity at any time during the years 1920 to 1985 which then imported said raw asbestos fiber to the Port of Stockton and/or the Port of Sacramento at any time during the years 1920 to 1985.

RESPONSE TO INTERROGATORY NO. 7:

See general objection 4 and Union Carbide's response to interrogatory no. 3.

INTERROGATORY NO. 8:

Please state for each year that the entity(ies) referred to in Interrogatory Number 7 imported raw asbestos fiber:

a) The name and address of each such entity;

b) The locations (including country, state and city) from which the raw asbestos fiber was imported;

c) The destinations (including city, dock numbers and Pier numbers) to which the raw asbestos fiber was imported;

d) The method of transportation used to import the raw asbestos fiber, including:

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(i) The name and address of the carrier(s) for each Year such entity(ies) imported defendant's raw asbestos fiber to each location listed in Interrogatory Number 8(c);

(ii) A detailed description of the raw asbestos fiber conveyed to the carrier(s);

(iii) Whether defendant has any documents or writings containing any information regarding the importation of raw asbestos fiber referred to in Interrogatory Number 7 and the name and address of the custodian of such documents or writings;

(iv) A detailed description of the information such writings contain;

e) The amount in pounds of raw asbestos fiber imported to each location listed in subpart (c) of this interrogatory;

f) The type (i.e., amosite, chrysotile, crocidolite, etc.) and grade of raw asbestos fiber imported to each such location;

g) The names and locations of the mines which supplied the raw asbestos fiber to defendant;

h) The type(s) of packaging used to contain the raw asbestos fiber imported to each location listed in subpart (c) of this interrogatory, including:

(i) The type of material (i.e., burlap, fabric, paper, plastic, etc.);

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(ii) The color of the packaging;

(iii) The dimensions of the packaging;

(iv) The weight of said Packages when packed with raw asbestos fiber;

(v) A detailed description of all writing on the packaging, including the color, size and location of the writings;

(vi) Whether any changes were made in the type of packaging and the dates and reasons for such changes;

i) Whether any entity placed a warning regarding the hazards of inhaling any asbestos dust on any of such packages of raw asbestos fiber, and if so, state:

(i) The name and address of the entity which placed the warning on such packages;

(ii) The date when such warning was first placed on such packages;

(iii) The exact wording of the warning;

(iv) The location of the warning;

(v) The size and color of the lettering of the warning;

(vi) All of the facts and circumstances which motivated the placement of such warnings on such packages;

(vii) Whether any changes were made to the wording of the warning, and, if so, the precise nature of such changes, the date(s) such changes were made, and the reasons for such changes;

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j) The names and addresses of the individuals most knowledgable [sic] about subparts (a) - (i) of this interrogatory;

k) Whether any of the individuals listed in subpart (j) of this interrogatory have ever been deposed or testified in lawsuits alleging personal injuries from exposure to asbestos dust, and if so, please list such individuals, and state for each individual the date(s) of deposition of trial testimony, the jurisdiction in which such deposition or trial testimony was given, the style of the case, and the name and address of the Plaintiff's attorney;

l) Whether defendant or any entity listed in subpart (a) of this interrogatory has any writings which contain any of the information sought in any subpart of this interrogatory;

m) If your answer to subpart (l) of this interrogatory is "yes":

(i) State the name and address of the custodian of such writings;

(ii) Describe in detail the types of writings available;

(iii) Describe in detail the contents of each such writing as it pertains to the information requested in this interrogatory;

n) If your answer to subpart (l) of this interrogatory is "no":

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(i) State whether such writings ever existed;

(ii) If such writings existed, state whether they have been destroyed, and if so, state the name and address of the person responsible for destroying them, the reason they were destroyed, the name and address of the custodian of such writings, and describe in detail the contents of such writings.

RESPONSE TO INTERROGATORY NO. 8:

Not applicable.

INTERROGATORY NO. 9:

State whether you exported any asbestos-containing products from the Port of Stockton and/or the Port of Sacramento at any time during the years 1920 to 1985.

RESPONSE TO INTERROGATORY NO. 9:

See general objection 3 and Union Carbide's response to interrogatory no. 1.

INTERROGATORY NO. 10:

Please state for each such year you exported asbestos-containing products:

a) The locations (including city, dock numbers and pier numbers) from which the asbestos-containing products were exported;

b) The destinations (including country, state and city) to which the asbestos containing products were exported;

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c) The method of transportation used to export the asbestos-containing products, including:

(i) The name and address of the carrier(s) for each year defendant exported asbestos-containing products from each location listed in Interrogatory Number 10(a);

(ii) A detailed description of the asbestos-containing products conveyed to the carrier(s);

(iii) Whether defendant has any documents or writings containing any information regarding defendant's exportation of asbestos-containing products and the name and address of the custodian of such documents or writings;

(iv) A detailed description of the information these writings contain;

d) The amount in pounds of asbestos-containing products exported from each location listed in subpart (a) of this interrogatory;

e) The type, (i.e., amosite, chrysotile, crocidolite, etc.) and grade of asbestos contained in the asbestos-containing products exported from each such location;

f) The names and locations of the mines which supplied the raw asbestos fiber contained in defendant's asbestos-containing products exported from each such location;

g) The type(s) of packaging used to contain the asbestos-containing products exported from each location listed in subpart (a) of this interrogatory, including:

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(i) The type of material (i.e., burlap, fabric, paper, plastic, etc.);

(ii) The color of the packaging;

(iii) The dimensions of the packaging;

(iv) The weight of said packages when packed with asbestos-containing products;

(v) A detailed description of all writing on the packaging, including the color, size and location of the writing;

(vi) Whether any changes were made in the type of packaging and dates and reasons for such changes;

h) Whether any entity placed a warning regarding the hazards of inhaling asbestos dust on any such packages of asbestos-containing products, and if so, state.

(i) The name and address of the entity which placed the warning on such packages;

(ii) The date when the warning was first placed on such packages;

(iii) The exact wording of the warning;

(iv) The iocation of the warning;

(v) The size and color of the lettering of the warning;

(vi) All of the facts and circumstances which motivated the placement of such warnings on such packages;

(vii) Whether any changes were made to the wording of the warning, and if so, the precise nature of such

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changes, the date(s) such changes were made, and the reasons for such changes;

i) The names and addresses of the individuals most knowledgable [sic] about subparts (a) - (h) of this interrogatory;

j) Whether any of the individuals listed in subpart i) of this interrogatory have ever been deposed or testified in lawsuits alleging personal injuries from exposure to asbestos dust, and if so, please list such individuals, and state for each individual the date(s) of deposition or trial testimony, the jurisdiction in which such deposition or trial testimony was given, the style of the case, and the name and address of the plaintiff's attorney;

k) Whether defendant has any writings which contain any of the information sought in any subpart of this interrogatory;

l) If your answer to subpart (k) of this interrogatory is "yes":

(i) State the name and address of the custodian of such writings;

(ii) Describe in detail the types of writings you have;

(iii) Describe in detail the contents of each such writing as it pertains to the information requested in this interrogatory;

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m) If your answer to subpart (k) of this interrogatory is "no":

(i) State whether such writings ever existed;

(ii) If such writings existed, state whether they have been destroyed, and if so, state the name and address of the Person responsible for destroying them, the reason they were destroyed, the name and address of the custodian of such writings, and describe in detail the contents of such writings.

RESPONSE TO INTERROGATORY NO. 10:

Not applicable.

INTERROGATORY NO. 11:

State whether you supplied or sold any asbestos-containing products to any distributor, supplier, broker or any other entity at any time during the years 1920 to 1985 which then exported said asbestos-containing products from the Port of Stockton and/or the Port of Sacramento at any time during the years 1920 to 1985.

RESPONSE TO INTERROGATORY NO. 11:

See Union Carbide's response to interrogatory no. 3.

INTERROGATORY NO. 12:

Please state for each year that the entity(ies) referred to in Interrogatory Number 11 exported asbestos-containing products:

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a) The name and address of each such entity;

b) The locations (including city, dock numbers and pier numbers) from which the asbestos-containing products were exported;

c) The destinations (including country, state and city) to which the asbestos-containing products were exported;

d) The method of transportation used to export the asbestos-containing products, including:

(i) The name and address of the carrier(s) for each year such entity(ies) exported defendant's asbestos-containing products from each location listed in Interrogatory Number 12(b);

(ii) A detailed description of the asbestos-containing products conveyed to the carrier(s);

(iii) Whether defendant has any documents or writings containing any information regarding the exportation of the asbestos-containing products referred to in Interrogatory Number 11 and the custodian of such documents or writings;

(iv) A detailed description of the information such writings contain;

e) The amount in pounds of asbestos-containing Products exported from each location listed in subpart (b) of this interrogatory;

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f) The type, (i.e., amosite, chrysotile, crocidolite, etc.) and grade of asbestos contained in the asbestos-containing products exported from each such location;

g) The names and locations of the mines which supplied the raw asbestos fiber contained in such asbestos-containing products exported from each such location;

h) The type(s) of packaging used to contain the asbestos-containing products exported from each location listed in subpart (b) of this interrogatory, including:

(i) The type of material, (i.e., burlap, fabric, paper, plastic, etc.);

(ii) The color of the packaging;

(iii) The dimensions of the packaging;

(iv) The weight of said packages when packed with asbestos-containing products;

(v) A detailed description of all writing on the packaging, including the color, size and location of the writing;

(vi) Whether any changes were made in the type of packaging and the dates and reasons for such changes;

i) Whether any entity placed a warning regarding the hazards of inhaling any asbestos dust on any such packages of asbestos-containing products and, if so, state:

(i) The name and address of the entity which placed the warning on such packages;

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(ii) The date when such warning was first placed on such packages;

(iii) The exact wording of the warning;

(iv) The location of the warning;

(v) The size and color of the lettering of the warning;

(vi) All of the facts and circumstances which motivated the placement of such warnings on such packages;

(vii) Whether any changes were made to the wording of the warning, and if so, the precise nature of such changes, the date(s) such changes were made, and the reasons for such changes;

j) The names and addresses of the individuals most knowledgeable about subparts (a) - (i) of this interrogatory;

k) Whether any of the individuals listed in subpart (j) of this interrogatory have ever been deposed or testified in lawsuits alleging personal injuries from exposure to asbestos dust, and if so, please list such individuals, and state for each individual the date(s) of deposition or trial testimony, the jurisdiction in which such deposition or trial testimony was given, the style of the case, and the name and address of the plaintiff's attorney;

l) Whether defendant or any entity listed in subpart (a) of this interrogatory has any writings which

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contain any of the information sought in any subpart of this interrogatory;

m) If your answer to subpart (l) of this interrogatory is "yes":

(i) State the name and address of the custodian of such writings;

(ii) Describe in detail the types of writing available;

(iii) Describe in detail the contents of each such writing as it pertains to the information requested in this interrogatory;

n) If your answer to subpart (l) of this interrogatory is "no":

(i) State whether such writings ever existed;

(ii) If such writings existed, state whether they have been destroyed, and if so, state the name and address of the person responsible for destroying them, the reason they were destroyed, the name of the custodian of such writings, and describe in detail the contents of such writings.

RESPONSE TO INTERROGATORY NO. 12:

Not applicable.

INTERROGATORY NO. 13:

State whether you imported any asbestos-containing products to the Port of Stockton and/or the Port of Sacramento at any time during the years 1920 to 1985.

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RESPONSE TO INTERROGATORY NO. 13:

See general objection 3 and Union Carbide's response to interrogatory no. 1.

INTERROGATORY NO. 14:

Please state for each such year you imported asbestos-containing products:

a) The locations (including country, state and city) from which the asbestos-containing products were imported;

b) The destinations (including city, dock numbers and pier numbers) to which the asbestos-containing Products were imported;

c) The method of transportation used to import the asbestos-containing products, including:

(i) The name and address of the carrier(s) for each year defendant imported asbestos-containing products to each location listed in Interrogatory Number 14(b);

(ii) A detailed description of the asbestos-containing products conveyed to the carrier(s);

(iii) Whether defendant has any documents or writings containing any information regarding defendant's importation of asbestos-containing products and the name and address of the custodian of such documents or writings;

(iv) A detailed description of the information these writings contain;

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d) The amount in pounds of asbestos-containing products imported to each location listed in subpart (b) of this interrogatory;

e) The type, (i.e., amosite, chrysotile, crocidolite, etc.) and grade of raw asbestos fiber contained in the asbestos-containing products imported to each such location;

f) The names and locations of the mines which supplied the raw asbestos fiber contained in defendant's asbestos-containing products imported to each such location;

g) The type(s) of packaging used to contain the asbestos-containing products imported to each location listed in subpart (b) of this interrogatory, including:

(i) The type of material (i.e., burlap, fabric, paper, plastic, etc.);

(ii) The color of the packaging;

(iii) The dimensions of the packaging;

(iv) The weight of said packages when packed with asbestos-containing product(s);

(v) A detailed description of all writing on the packaging, including the color, size and location of the writing;

(vi) Whether any changes were made in the type of packaging and dates and reasons for such changes;

h) Whether any entity placed a warning regarding the hazards of inhaling asbestos dust on any such packages of asbestos-containing products, and if so, state:

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(i) The name and address of the entity which placed the warning on such packages;

(ii) The date when the warning was first placed on such packages;

(iii) The exact wording of the warning;

(iv) The location of the warning;

(v) The size and color of the lettering of the warning;

(vi) All of the facts and circumstances which motivated the placement of such warnings on such packages;

(vii) Whether any changes were made to the wording of the warning, and if so, the precise nature of such changes, the date(s) such changes were made, and the reasons for such changes.

i) The names and addresses of the individuals most knowledgable [sic] about subparts (a) - (h) of this interrogatory;

j) Whether any of the individuals listed in subpart (i) of this interrogatory have ever been deposed or testified in lawsuits alleging personal injuries from exposure to asbestos dust, and if so, please list such individuals, and state for each individual the date(s) of deposition or trial testimony, the jurisdiction in which such deposition or trial testimony was given, the style of the case, and the name and address of the plaintiff's attorney;

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k) Whether defendant has any writings which contain any of the information sought in any subpart of this interrogatory;

l) If your answer to subpart (k) of this interrogatory is "yes":

(i) State the name and address of the custodian of such writings;

(ii) Describe in detail the types of writings you have;

(iii) Describe in detail the contents of each such writing as it pertains to the information requested in this interrogatory;

m) If your answer to subpart (k) of this interrogatory is "no";

(i) State whether such writings ever existed;

(ii) If such writings existed, state whether they have been destroyed, and if so, state the name and address of the person responsible for destroying them, the reason they were destroyed, the name and address of the custodian of such writings, and describe in detail the contents of such writings.

RESPONSE TO INTERROGATORY NO. 14:

Not applicable.

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INTERROGATORY NO. 15:

State whether you supplied or sold any asbestos-containing products to any distributor, supplier, broker or any other entity at any time during the years 1920 to 1985 which imported said asbestos-containing products to the Port of Stockton and/or the Port of Sacramento at any time during the years 1920 to 1985.

RESPONSE TO INTERROGATORY NO. 15:

See general objections 3 & 4 and Union Carbide's response to interrogatory no. 3.

INTERROGATORY NO. 16:

Please state for each year that the entity(ies) referred to in Interrogatory Number 15 imported asbestos-containing products:

a) The name and address of each such entity;

b) The locations (including country, state and city) from which the asbestos-containing products were imported;

c) The destination (including city, dock numbers and pier numbers) to which the asbestos-containing products were imported;

d) The method of transportation used to import the asbestos-containing products, including:

(i) The name and address of the carrier(s) for each year such entity(ies) imported defendant's asbestos-containing products to each location listed in Interrogatory Number 16(c);

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(ii) A detailed description of the asbestos-containing products conveyed to the carrier(s);

(iii) Whether defendant has any documents or writings containing any information regarding the importation of asbestos-containing products referred to in Interrogatory Number 15 and the name and address of the custodian of such documents;

(iv) A detailed description of the information which such writings contain;

e) The amount in pounds of asbestos-containing products imported to each location listed in subpart (c) of this interrogatory;

f) The type (i.e. amosite, chrysotile, crocidolite, etc.) and grade of raw asbestos fiber contained in the asbestos-containing products imported to each such location;

g) The names and locations of the mines which supplied the raw asbestos fiber contained in such asbestos-containing products imported to each such location;

h) The type(s) of packaging used to contain the asbestos-containing products imported to each location listed in subpart (c) of this interrogatory, including:

(i) The type of material, (i.e., burlap, fabric, paper, plastic, etc.);

(ii) The color of the packaging;

(iii) The dimensions of the packaging;

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(iv) The weight of said packaging when packed with asbestos-containing products;

(v) A detailed description of all writing on the packaging, including the color, size and location of the writing;

(vi) Whether any changes were made in the type of packaging and the dates and reasons for such changes;

i) Whether any entity placed a warning regarding the hazards of inhaling any asbestos dust on any such packages of asbestos-containing products, and if so, state:

(i) The name and address of the entity which placed the warning on such packages;

(ii) The date when such warning was first placed on such packages;

(iii) The exact wording of the warning;

(iv) The location of the warning;

(v) The size and color of the lettering of the warning;

(vi) All of the facts and circumstances which motivated the placement of such warnings on such packages;

(vii) Whether any changes were made to the wording of the warning, and, if so, the precise nature of such changes, the date(s) such changes were made, and the reasons for such changes;

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j) The names and addresses of the individuals most knowledgeable about subparts (a) - (i) of this interrogatory;

k) Whether any of the individuals listed in subpart (j) of this interrogatory have ever been deposed or testified in lawsuits alleging personal injuries from exposure to asbestos dust, and if so, please list such individuals, and state for each individual the date(s) of deposition or trial testimony the jurisdiction in which such deposition or trial testimony was given, the style of the case, and the name and address of the plaintiff's attorney;

l) Whether defendant or any entity listed in subpart (a) of this interrogatory has any writings which contain any of the information sought in any subpart of this interrogatory;

m) If your answer to subpart (k) of this interrogatory is "yes":

(i) State the name and address of the custodian of such writings;

(ii) Describe in detail the types of writing available;

(iii) Describe in detail the contents of each such writing as it pertains to the information requested in this interrogatory;

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n) If your answer to subpart (1) of this interrogatory is "no":

(i) State whether such writings ever existed;

(ii) If such writings existed, state whether they have been destroyed, and if so, state the name and address of the person responsible for destroying them, the reason they were destroyed, the name and address of the custodian of such writings, and describe in detail the contents of such writings.

RESPONSE TO INTERROGATORY NO. 16:

Not applicable.

INTERROGATORY NO. 17:

Please state the name, place of employment, present address and job title of each person who has supplied information used in answering these interrogatories.

RESPONSE TO INTERROGATORY NO. 17:

The responses to these interrogatories have been drafted by counsel for Union Carbide based on documents kept by Union Carbide in the ordinary course of business. It is impossible to identify at personnel who may have contributed information contained in those documents. The custodian of Union Carbide records is Helen Duncan, Union Carbide Corporation, 39 Old Ridgebury Road, Danbury, Connecticut 06817.

In addition, John L. Meyer, former Product and Production Manager for Union Carbide asbestos operations

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(1981-1985), currently President of King City Asbestos Corporation (KCAC), supplied supplementary information incorporated in some of Union Carbide's responses to these interrogatories.

INTERROGATORY NO. 18:

Did defendant perform any repair, replacement or restoration work on any components (i.e., pipes, valves, boilers, bulkheads, ceilings, floors, engines, walls, etc.) in any ship in the Port of Stockton and/or the Port of Sacramento? If so, please state:

a) The location of each port at which such work was performed;

b) The inclusive dates such work was performed at each such port;

c) The names of the ships on which such work was performed for each year listed in subpart (b) of this interrogatory;

d) The pier numbers where such work was performed at each port and year listed above;

e) A detailed description for each port and year listed above of the nature of such work performed;

f) A detailed description of each type of asbestos-containing product used in performing such work;

g) The name(s) and address(es) of all individuals who performed such work for each year;

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h) The name(s) and address(es) of the individual(s) most knowledgeable about the performance of such work for each port and year listed above;

i) Whether any of the individuals listed in subpart (g) or (h) of this interrogatory has ever been deposed or testified in lawsuit(s) alleging Personal injuries from exposure to asbestos dust, and if so, please list such individuals, and state for each individual the date(s) of deposition or trial testimony, the jurisdiction in which such deposition or trial testimony was given, the style of the case, and the name and address of the plaintiff's attorney;

j) Whether defendant has any writings which contain any of the information contained in any subpart of this interrogatory;

k) If your answer to subpart i) of this interrogatory is "yes":

(i) State the name and address of the custodian of such writings;

(ii) Describe in detail the types of writings available;

(iii) Describe in detail the contents of each such writing as it pertains to the information requested in this interrogatory;

k) [sic] If your answer to subpart i) of this interrogatory is "no":

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(i) State whether such writings ever existed;

(ii) If such writings existed, state whether they have been destroyed, and if so, state the name and address of the person responsible for destroying them, the reason they were destroyed, the name and address of the custodian of such writings, and describe in detail the contents of such writings.

RESPONSE TO INTERROGATORY NO. 18:

No, to the best of Union Carbide's knowledge.

DATED: 2-2-87, ~~1986~~

BROBECK PHLEGER & HARRISON

By: John E Cotter
Attorneys for Defendant
UNION CARBIDE CORPORATION

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

John Macdonald, being duly sworn according to law deposes and says that he is Assistant Secretary of Union Carbide Corporation, defendant in this action; that he has read the foregoing Responses to Plaintiff's Interrogatories and believes the contents to be true; that the foregoing Responses have been assembled and prepared by employees and counsel of the defendant who have informed deponent that the foregoing Responses are true.

John Macdonald

Sworn to before me
this 7th day of January
1987.

Martha Lyons
Notary Public