PLAINTIFF'S EXHIBIT

UC-5328

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UNION CARBIDE CORPORATION

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SOLANO

IN RE: SOLANO COUNTY COMPLEX ASBESTOS LITIGATION

Case No. 2830

UNION CARBIDE CORPORATION'S RESPONSES TO PLAINTIFFS' FIRST SET OF INTERROGATORIES

PROPOUNDING PARTY: Plaintiffs

RESPONDING PARTY: UNION CARBIDE CORPORATION

SET NUMBER: ONE (1)

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

GENERAL OBJECTIONS

Union Carbide Corporation objects to the entire First Set of Interrogatories based on the following grounds, which are hereby incorporated by reference in Union Carbide's response to individual interrogatories below.

1. Union Carbide states that trial preparation and factual investigation are ongoing. Union Carbide's answers to these interrogatories are based on information known to Union Carbide at this time. Union Carbide reserves the right,

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however to make reference at the trial or at any hearing in this action to facts and documents not identified in these responses, the existence or relevance of which is later discovered by it or its counsel. By this reservation, Union Carbide does not in any way assume a continuing responsibility to update its responses to these interrogatories, and specifically objects to each of these interrogatories to the extent that they seek to impose any such continuing obligation upon Union Carbide.

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

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

4. Union Carbide objects to any request to provide information about any asbestos-containing product which it has manufactured, sold or distributed, on the grounds that the asbestos fiber in those products was encapsulated by or embedded in other material and on the grounds that the plaintiffs have not alleged exposure to those products. See

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Union Carbide's response to interrogatory no. 15 for a list and description of those products. From 1963 until June 30, 1985, Union Carbide mined and sold short fiber chrysotile asbestos initially as "Union Carbide Asbestos" and then under the trade name Calidria (some distributors marketed Calidria under other trade names). Calidria was marketed in both pellet and fibrous form and was used in products or production processes as a filler, reinforcer, opacifier, thixotrope (thickener) and the like. Calidria asbestos was not suited and could not be marketed for use as heat or frost insulation due to its quality and composition, in particular, the short length of its fiber. All responses to these interrogatories refer only to Calidria asbestos.

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

INTERROGATORY NO. 1:

With respect to the individual verifying these answers on your behalf, state the following:

a) their name;

b) their present business address;

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c) their present job title;

d) their date of first employment with you, and the dates and titles of each job position they have held while they were employed by you.

RESPONSE TO INTERROGATORY NO. 1:

a) John Macdonald

b) Present business address is:

39 Old Ridgebury Road

Danbury, Ct. 06817

c) Present job title:

Assistant Corporate Secretary of Union Carbide Corporation.

d) John Macdonald was first employed by Union Carbide Corporation in December 1969.

INTERROGATORY NO. 2:

State whether YOU are a corporation. If so, state:

a. YOUR full corporate name;

b. the state of incorporation;

c. the date of incorporation;

d. the address of YOUR principal place of business;

e. if YOU are wholly-owned or if more than five (5) percent of the ownership interest of YOUR COMPANY is owned by another business entity, state that entity's name and principal place of business.

RESPONSE TO INTERROGATORY NO. 2:

Yes.

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a) Union Carbide Corporation

b) New York State

c) November 11, 1917

d) Union Carbide Corporation
39 Old Ridgebury Road
Danbury, Ct. 06817

e) Not applicable.

INTERROGATORY NO. 3:

Has THIS DEFENDANT ever been identified, known, or done business under any other name? If so, please state such name or names and the time period during which THIS DEFENDANT was so known or identified.

RESPONSE TO INTERROGATORY NO. 3:

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

See Union Carbide's response to interrogatory no. 3. Union Carbide Corporation was first incorporated in 1917 under the name of "Union Carbide & Carbon Products" and changed its name to Union Carbide Corporation in 1957.

INTERROGATORY NO. 4:

State whether YOU have ever been registered or qualified to do business in the State of California? If so, state the date YOU became qualified to conduct business in the State of California.

RESPONSE TO INTERROGATORY NO. 4:

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

Union Carbide obtained a Certificate of Authority to do Business in the State of California on July 31, 1942.

INTERROGATORY NO. 5:

Does THIS DEFENDANT currently have, or has THIS DEFENDANT had a department, division, subdivision, branch or group responsible for the design, development, manufacture, testing and use of ASBESTOS-CONTAINING PRODUCT(S)? If so, state:

a) the name of each present or former corporate department, division, subdivision, branch or group;

b) the IDENTITY of the person most knowledgeable about such department, division, subdivision, branch or group.

RESPONSE TO INTERROGATORY NO. 5:

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

Not applicable: Calidria consisted of raw, short fibre chrysotile asbestos mined by Union Carbide at or near King City, California and sold to manufacturers and producers for use in their products and production processes.

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INTERROGATORY NO. 6:

Has THIS DEFENDANT engaged in the MARKETing of ASBESTOS-CONTAINING PRODUCT(S) comprised in whole or in part of amosite asbestos fiber; if so, please state:

a) the trade, brand name and/or generic name of each type of product;

b) the date(s) THIS DEFENDANT first MARKETed each type of product;

c) the date(s) THIS DEFENDANT ceased MARKETing each type of product;

d) a general description of the chemical composition of each type of product, including:

(i) the type(s) and/or grade(s) of RAW ASBESTOS FIBER contained in each type of product;

(ii) the quantitative percentage of the type(s) of RAW ASBESTOS FIBER in each type of product;

(iii) any change(s) in the quantitative percentages of the type(s) of RAW ASBESTOS FIBER in each type of product;

e) the NATURE of each type of product;

f) a description of any wording, markings and/or logo on each type of product;

g) the recommended use(s) of each type of product, including temperature limits;

h) the name(s) of the manufacturer(s) of each type of product;

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i) the name(s) and address(es) of the supplier(s) of the amosite asbestos fiber used in each type of product;

j) the IDENTITY of the person(s) most knowledgeable concerning the purchase of amosite asbestos fiber by THIS DEFENDANT.

RESPONSE TO INTERROGATORY NO. 6:

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

INTERROGATORY NO. 7:

Has THIS DEFENDANT engaged in the MARKETing of amosite asbestos fiber; if so, please state:

a) the name and location of each amosite asbestos mine which THIS DEFENDANT presently operates, has operated, or in which THIS DEFENDANT has or had an ownership interest, including the dates of such ownership, and the grade of amosite asbestos fiber mined;

b) the date(s) THIS DEFENDANT first MARKETed amosite asbestos fiber;

c) the date(s) THIS DEFENDANT ceased MARKETing amosite asbestos fiber;

d) the grade(s) of such amosite asbestos fiber MARKETed by THIS DEFENDANT;

e) the recommended use(s) of each grade of such amosite asbestos fiber, including any temperature limits;

f) the name(s) and address(es) of the supplier(s) of amosite asbestos fiber to THIS DEFENDANT.

RESPONSE TO INTERROGATORY NO. 7:

No, Union Carbide never mined or sold amosite asbestos fibre.

INTERROGATORY NO. 8:

Has THIS DEFENDANT engaged in the MARKETing of ASBESTOS-CONTAINING PRODUCTS comprised in whole or in part of chrysotile asbestos fiber; if so, please state:

a) the trade, brand name and/or generic name of each type of product;

b) the date(s) this Defendant first MARKETed each type of product;

c) the date(s) THIS DEFENDANT ceased MARKETing each type of product;

d) a general description of the chemical composition of each tyupe of product, including:

(i) the type(s) and grade(s) of asbestos fiber contained in each type of product;

(ii) the quantitative percentage of the type(s) of RAW ASBESTOS FIBER in each type of product;

(iii) any change(s) in the quantitative percentages of the type(s) of RAW ASBESTOS FIBER in each type of product;

e) the NATURE of each type of product;

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f) a description of any wording, markings and/or logo on each type of product;

g) the recommended use(s) of each type of product, including temperature limits;

h) the name(s) of the manufacturer(s) of each type of product;

i) the name(s) and address(es) of the supplier(s) of the chrysotile asbestos fiber used in each type of product;

j) the IDENTITY of the person(s) most knowledgeable concerning the purchase of chrysotile asbestos fiber by THIS DEFENDANT.

RESPONSE TO INTERROGATORY NO. 8:

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

INTERROGATORY NO. 9:

Has THIS DEFENDANT engaged in the MARKETing of chrysotile asbestos fiber; if so, please state:

a) the name and location of each chrysotile asbestos mine which THIS DEFENDANT presently operates, has operated, or in which THIS DEFENDANT has or had an ownership interest, including the dates of such ownership, and the grade of chrysotile asbestos fiber mined;

b) the date(s) THIS DEFENDANT first MARKETed chrysotile asbestos fiber;

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c) the date(s) THIS DEFENDANT ceased MARKETing chrysotile asbestos fiber;

d) the grade(s) of such chrysotile asbestos fiber MARKETed by THIS DEFENDANT;

e) the recommended use(s) of each grade of such chrysotile asbestos fiber, including any temperature limits;

f) the name(s) and address(es) of the supplier(s) of chrysotile asbestos fiber to THIS DEFENDANT.

RESPONSE TO INTERROGATORY NO. 9:

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

a) Union Carbide mined and milled unique short fiber chrysotile asbestos from a deposit at or near King City, California.

b) 1963.

c) June, 1985

d) Union Carbide produced four grades of Calidria asbestos: standard, super standard, high purity, and resin grade; the different grades reflect varying degrees of purity of content. Each grade was sold in both pelletized and fibrous form. The following is a representative listing and description of the various brands of Calidria mined and marketed by Union Carbide:

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PRODUCT SYMBOL	PRODUCT CODE	DESCRIPTION
HPO	651001	High Purity, Open Fiber
HPO-C	651101	High Purity, Open Fiber
HPP	651601	High Purity, Pellets
HPP-JAP	651701	High Purity, Pellets, 4-Ply bags
R-G 110	652101	Resin-Grade, Open Fiber 15% +325
R-G 110-D	652201	Resin-Grade, Open Fiber, 15% +325
R-G 144	652501	Resin-Grade, Open Fiber
A-14	652801	Resin-Grade, Open Fiber
R-G 244	653001	Resin-Grade, Open Fiber
R-G 444-0	653301	Resin-Grade, Open Fiber, 10% Stearic
A-28	653601	Resin-Grade, Open Fiber, Silica Treated
SG-100	654001	Standard Grade, Pellets
SG-102	654201	Standard Grade, Pellets, 100-lb. bags
SG-130	654501	Standard Grade, Open Fiber, 30% +325
SG-144	654801	Standard Grade, Open Fiber, 45% +325
SG-200	655001	Super Standard Grade, Pellets
SG-210	655301	Super Standard Grade, Open Fiber, 15% +325
SG-444-0	655501	Standard Grade, Open Fiber, 5% Stearic, Hydrophobic
T-135-0	656001	High Purity, Open Fiber, Titanated, 35%, Anatase
T-135-P	656301	High Purity, Pellets, Titanated, 35%, Anatase
CG-100	656601	Coatings Grade, Pellets
CG-135-0	656801	Coatings Grade, Open Fiber, Titanated 35%, Rutile
CG-135-P	656901	Coatings Grade, Pellets, Titanated, 35%, Rutile
Super-Visbestos	657301	Super Standard Grade, Cracked Pellets
Visbestos	657601	Standard Grade, Open Fiber
Oilbestos	657001	Standard Grade, Open Fiber, 5% Stearic, Hydrophobic

e) Calidria, due to its unique physical properties, short fiber length in particular, was not suited for use in thermal or frost insulation.

Calidria consisted of raw asbestos which was marketed and sold by Calidria distributors to manufacturers or producers who incorporated and used Calidria in their products or production processes. Calidria was not sold by Union Carbide

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or, according to the best information available to Union Carbide, by Calidria distributors to consumers or other "end-users". The following is a representative list of different brands of Calidria asbestos and the applications for which they were marketed:

Calidria Product	Applications
SG-100	Vinyl-Asbestos Floor Tile
SG-130	Masonry Coatings
SG-200	Rubber Floor Tile
Super Visbestos	Drilling Muds
SG-210	Mastics Asphaltic Coatings
HPP	Rubber Sheet Goods Mineral Board (Japan) Paper (Japan)
HPO	Asphaltic Coatings, Adhesives
RG-110	Asphaltic Spray Coatings Aluminized Coatings Mastics, Caulks and Sealants
RG-144	Adhesives (Epoxy, Casim, Phenolics) Coatings Vinyl Plastisols (High Build, Dip Coatings) Mastics, Caulks and Sealants (Vinyl, Butyl, Polysulfide, Bituminous)
RG-244	Polyester Resins (Laminating, Gel Coats, Putties) Caulks and Sealants (Vinyl, Butyl, Acrylic, Polyurethane) Coatings (Epoxy, Urethane, Asphaltic)

In addition to the different markets in which the Calidria products listed above were respectively sold, other brands of

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Calidria may have been sold within the same markets. Such brands of Calidria were distinguished on the basis of grade (purity of content), form (fibrous or pelletized) or chemical treatment, or a combination of the above.

INTERROGATORY NO. 10:

Has THIS DEFENDANT engaged in the MARKETing of ASBESTOS-CONTAINING PRODUCT(S) comprised in whole or in part of crocidolite asbestos fiber; if so, please state:

a) the trade, brand name and/or generic name of each type of product;

b) the date(s) THIS DEFENDANT first MARKETed each type of product;

c) the date(s) THIS DEFENDANT ceased MARKETing each type of product;

d) a general description of the chemical composition of each type of product, including:

(i) the type(s) and/or grade(s) of RAW ASBESTOS FIBER contained in each type of product;

(ii) the quantitative percentage of the type(s) of RAW ASBESTOS FIBER in each type of product;

(iii) any change(s) in the quantitative percentages of the type(s) of RAW ASBESTOS FIBER in each type of product;

e) the NATURE of each type of product;

f) a description of any wording, markings and/or logo on each type of product;

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g) the recommended use(s) of each type of product, including temperature limits;

h) the name(s) of the manufacturer(s) of each type of product;

i) the name(s) and address(es) of the supplier(s) of the crocidolite asbestos fiber used in each type of product;

j) the IDENTITY of the person(s) most knowledgeable concerning the purchase of crocidolite asbestos fiber by THIS DEFENDANT.

RESPONSE TO INTERROGATORY NO. 10:

See general objection 4. Union Carbide objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, vague and ambiguous.

INTERROGATORY NO. 11:

Has THIS DEFENDANT engaged in the MARKETing of crocidolite asbestos fiber; if so, please state:

a) the name and location of each crocidolite asbestos mine which THIS DEFENDANT presently operates, has operated, or in which THIS DEFENDANT has or had an ownership interest, including the dates of such ownership, and the grade of crocidolite asbestos fiber mined;

b) the date(s) THIS DEFENDANT first MARKETed crocidolite asbestos fiber;

c) the date(s) THIS DEFENDANT ceased MARKETing crocidolite asbestos fiber;

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d) the grade(s) of such crocidolite asbestos fiber MARKETed by THIS DEFENDANT;

e) the recommended use(s) of each grade of such crocidolite asbestos fiber, including any temperature limits;

f) the name(s) and address(es) of the supplier(s) of crocidolite asbestos fiber to THIS DEFENDANT.

RESPONSE TO INTERROGATORY NO. 11:

No, Union Carbide never mined or sold crocidolite asbestos.

INTERROGATORY NO. 12:

Does or did THIS DEFENDANT have a controlling ownership interest in any COMPANY which MARKETed ASBESTOS-CONTAINING PRODUCTS; if so, please state:

a) the name of such COMPANY;

b) the date of incorporation of such COMPANY;

c) the state of incorporation of such COMPANY;

d) the date such interest was acquired;

e) the date such interest was changed or terminated, if applicable;

f) the name and location of each facility of such COMPANY;

g) the name of each type of ASBESTOS-CONTAINING PRODUCT(S) manufactured, processed, and/or assembled by such COMPANY.

RESPONSE TO INTERROGATORY NO. 12:

See general objection 4. Union Carbide also objects

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

In 1976 Union Carbide acquired another company which prior to its acquisition by Union Carbide had manufactured a line of mastic sealants, coatings and adhesives, some of which contained small quantities of asbestos. The asbestos fiber in those products was encapsulated by binder ingredients in the production process. The company sold the division which produced these products and ceased producing all asbestos containing products (except for TRE-HOLD, a tree sprout inhibitor prior to Union Carbide's acquisition of the company).

INTERROGATORY NO. 13:

Does or did THIS DEFENDANT have a controlling ownership interest in any COMPANY that MARKETed RAW ASBESTOS FIBER: if so, please state:

a) the name of such COMPANY;

b) the date of incorporation or charter of such COMPANY;

c) the state or country of incorporation of such COMPANY;

d) the date such interest was acquired;

e) the dates such interest changed or terminated, if applicable;

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f) the name and location of each asbestos mine owned by such COMPANY;

g) the grade and type of RAW ASBESTOS FIBER mined at each mine.

RESPONSE TO INTERROGATORY NO. 13:

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

See Union Carbide's response to interrogatory no. 9.

INTERROGATORY NO. 14:

Has THIS DEFENDANT warehoused any RAW ASBESTOS FIBER or ASBESTOS-CONTAINING PRODUCT(S) in the State of California; if so, please state:

a) the address of each warehouse facility;

b) the year(s) THIS DEFENDANT utilized each facility;

c) the IDENTITY of the custodian of warehousing records.

RESPONSE TO INTERROGATORY NO. 14:

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

Union Carbide warehoused it's Calidria asbestos at its Torrance, California facility. The following is a list of

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former Calidria distributors in California which warehoused Calidria:

Van, Waters & Rogers 1363 S. Bonnie Beach Place Los Angeles, California 90054	1970-1971
Harrisons & Crosfield M&N Warehouse 6245 Christie Emerville, California 94608	1977-1984

INTERROGATORY NO. 15:

Has THIS DEFENDANT owned or operated facilities anywhere in the United States in which ASBESTOS-CONTAINING PRODUCT(S) have been manufactured, processed and/or assembled; if so, state:

a) the address of each such facility, including city and state.

RESPONSE TO INTERROGATORY NO. 15:

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

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

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Prior to 1976, Union Carbide manufactured a product called Bakelite, which is a phenolic molding compound. Bakelite was marketed by Union Carbide through distributors for use in electronic parts and products such as switches, switch boxes, radios, and plug in receptacles. The asbestos fiber in the Bakelite material was fully encapsulated.

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

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

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

Union Carbide also manufactured a steel "scarfer" machine (used to remove blemishes and imperfections from steel), with parts which contained some asbestos . In the late 1950's or early 1960's, Union Carbide may also have

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experimented with certain asbestos-containing polyethylene and polystyrene products which would have only been sold in limited quantities on an experimental basis.

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

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

INTERROGATORY NO. 16:

If THIS DEFENDANT owned or operated facilities in which ASBESTOS-CONTAINING PRODUCT(S) have been manufactured, processed and/or assembled, please state:

a) the date such facilities began operation;

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b) the date said facility ceased operation; and

c) the name of each type of ASBESTOS-CONTAINING PRODUCT manufactured, processed or assembled at each such facility.

RESPONSE TO INTERROGATORY NO. 16:

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

See Union Carbide's response to interrogatory no. 15.

INTERROGATORY NO. 17:

Has THIS DEFENDANT purchased or otherwise acquired any rights to the manufacture of ASBESTOS-CONTAINING PRODUCT(S) from another COMPANY? If so, state:

a) the date of purchase or acquisition of such rights;

b) the trade, brand, and/or generic name of such ASBESTOS-CONTAINING PRODUCT(S);

c) the name and location of any COMPANY from which such rights were purchased or acquired;

d) the IDENTITY of the custodian of records of such purchase(s) or acquisition(s).

RESPONSE TO INTERROGATORY NO. 17:

See general objection 4. Union Carbide objects to

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

See Union Carbide's response to interrogatory no. 12.

INTERROGATORY NO. 18:

Has THIS DEFENDANT applied for and/or received any patent(s) for any ASBESTOS-CONTAINING PRODUCT(S)? If so, state for each such ASBESTOS-CONTAINING PRODUCT:

a) the product for which each patent was applied and/or issued;

b) the date(s) of application;

c) the date(s) of issuance of the patent(s), if granted;

d) the date(s) of renewal, if any;

e) the patent number(s);

f) the name of the individual or COMPANY to whom each patent was issued;

g) the IDENTITY of the custodian of patent records of THIS DEFENDANT.

RESPONSE TO INTERROGATORY NO. 18:

See general objection 4. Union Carbide objects to this interrogatory on the grounds that it is overly broad and not reasonably limited by either time or subject matter to information which is relevant to the subject matter of the action or reasonably calculated to lead to the discovery of

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admissible evidence. Union Carbide further objects to this interrogatory on the ground that it seeks information which is in the public domain and which is readily accessible to plaintiff. Subject to its objections, Union Carbide responds as follows:

The following two patents are patents which have been obtained with respect to the use of Calidria asbestos: U.S. Patent No. 3,947,286 issued March 30, 1976 and U.S. Patent No. 3,838,085 issued September 24, 1974.

INTERROGATORY NO. 19:

Has THIS DEFENDANT registered any trademark(s) for any ASBESTOS-CONTAINING PRODUCT(S); if so, state for each such ASBESTOS-CONTAINING PRODUCT:

a) the product for which each trademark was registered;

b) whether the registration was State or Federal;

(i) if State, name the State;

c) the date(s) of registration;

d) the term(s) thereof;

e) the date(s) of renewal;

f) the name of the individual or COMPANY to whom each trademark was registered;

g) the IDENTITY of the custodian of such trademark records of THIS DEFENDANT.

RESPONSE TO INTERROGATORY NO. 19:

See general objection 4. Union Carbide objects to

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

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

INTERROGATORY NO. 20:

Did THIS DEFENDANT contract with the General Services Administration and/or other federal-government agency for the sale, anywhere in the United States, of RAW ASBESTOS FIBER between 1930 and 1980; if so, state for each such sale:

a) the grade(s) and type(s) of RAW ASBESTOS FIBER;

b) the quantity;

c) the date(s) of delivery;

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d) the location(s), including the address(es) of delivery;

e) the name(s) of the agency with which THIS DEFENDANT contracted;

f) the date(s) of execution of such contract(s);

g) the IDENTITY of the custodian of such contract records of THIS DEFENDANT.

RESPONSE TO INTERROGATORY NO. 20:

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

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

The aforesaid sales records contain no reference of any sale of Calidria to the General Services Administration. Upon plaintiff's request, Union Carbide will make its sales

records available to the plaintiff for review and duplication at a suitable time and place.

INTERROGATORY NO. 21:

Did THIS DEFENDANT contract with the General Services Administration and/or other federal-government agency for the sale, anywhere in the United States, of ASBESTOS-CONTAINING PRODUCT(S) between 1930 and 1980; if so, state for each such sale:

a) the grade(s) and type(s) of RAW ASBESTOS FIBER;

b) the quantity;

c) the date(s) of delivery;

d) the location(s), including the address(es) of delivery;

e) the name(s) of the agency with which THIS DEFENDANT contracted;

f) the date(s) of execution of such contract(s);

g) the IDENTITY of the custodian of such contract records of THIS DEFENDANT.

RESPONSE TO INTERROGATORY NO. 21:

See Union Carbide's response to interrogatory no. 20.

INTERROGATORY NO. 22:

Does this DEFENDANT have any records of the MARKETing, advertisement, or delivery of its RAW ASBESTOS FIBER and/or ASBESTOS-CONTAINING PRODUCT(S) in or to NORTHERN CALIFORNIA? If so, state:

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a) the manner in which the records are kept, (e.g., in boxes, files, on microfilm, microfiche or computer tape or disk);

b) the location(s) and address(es) where such records are maintained;

c) the IDENTITY of the custodian of such records.

RESPONSE TO INTERROGATORY NO. 22:

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

a) See Union Carbide's response to interrogatory no. 20. Union Carbide no longer mines or sells Calidria and no longer maintains records of advertisements for Calidria which it may have placed prior to 1966. The following is the most complete list and record of Calidria advertisements that Union Carbide is presently able to assemble:

Journal	Page(s)	Date(s)	Photographs or Diagrams
"Chemical 26"	Unknown	7/66	Yes
"Chemical 26"	17	9/66	Yes
(Technical Association of the Pulp and Paper Industry)			
"TAPPI"	44A-45A	2/66	Yes
"TAPPI"	141A	3/66	Yes
"TAPPI"	39A	10/66	No
"TAPPI"	41A	10/66	Yes
"TAPPI"	139A	11/66	No
"TAPPI"	141A	11/66	Yes
"TAPPI"	155A	12/66	No
"TAPPI"	157A	12/66	Yes
"TAPPI"	149A	1/66	No
	151A	1/67	Yes

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"TAPPI"	153A	1/67	Yes
"TAPPI"	131A	2/67	Yes
"TAPPI"	133A	2/67	Yes
"Pulp & Paper"	Unknown	5/2/66	Yes
"Pulp & Paper"	Unknown	5/2/66	Yes
"Pulp & Paper"	15	6/20/66	Yes
"Pulp & Paper"	9	11/21/66	Yes
"Pulp & Paper"	11	11/21/66	Yes
"Pulp & Paper"	55	12/5/66	No
"Pulp & Paper"	57	12/5/66	Yes
"Pulp & Paper"	45	12/19/66	Yes
"Pulp & Paper"	79	1/30/67	No
"Pulp & Paper"	81	1/30/67	Yes
"Pulp & Paper"	83	1/30/67	Yes
"Pulp & Paper"	65	2/20/67	Yes
"Paper Trade Journal"	4-5	3/7/66	Yes
"Paper Trade Journal"	37	1/9/67	Yes
"Paper Trade Journal"	35	2/6/67	No
"Paper Trade Journal"	37	2/6/67	Yes
"Paper Trade Journal"	83	2/20/67	No
"Paper Trade Journal"	85	2/20/67	Yes
"Oil & Gas & Petro-Chemical Equipment"	Unknown	10/66	Yes/1/
"Petroleum Equipment & Services"	Unknown	10/66	Yes/1/
"Drilling DCW"	Unknown	11/66	Yes/1/
"Petroleum Engineer"	Unknown	10/66	Yes/1/
"Rubber Red Block"	Unknown	1974 & 1975	Yes/2/

1/ This ad placed by Montello, Inc., a Union Carbide Distributor.
2/ This ad placed by Harwick Chemical, a Union Carbide Distributor.

b, c) Union Carbide's custodian of records is Mrs. Vina Shatah, Kelley Drye & Warren, Six Stamford Forum, Stamford, Connecticut 06901.

INTERROGATORY NO. 23:

If THIS DEFENDANT has in its possession any records of the MARKETing, advertisement, or delivery of its RAW ASBESTOS FIBER and/or ASBESTOS-CONTAINING PRODUCTS (including microfilm, microfiche, compute tape or disk, or any other system in which

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data is taken from other records), state whether THIS DEFENDANT has retained the original DOCUMENTS from which the data entered into these modes of storage was obtained. If THIS DEFENDANT has not retained such original DOCUMENTS, state:

a) the date(s) when and location(s) where the original DOCUMENTS were disposed of;

b) the IDENTITY of the custodian of the original DOCUMENTS at the time of their disposal.

RESPONSE TO INTERROGATORY NO. 23:

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

See Union Carbide's responses to interrogatories 20 and 22.

INTERROGATORY NO. 24:

Does THIS DEFENDANT have in its possession any exemplar(s) of advertisements or brochures describing its RAW ASBESTOS FIBER and/or ASBESTOS-CONTAINING PRODUCTS; if so, please state:

a) the location of each exemplar;

b) the year(s) in which said exemplar(s) was utilized;

c) the IDENTITY of the custodian of such exemplars.

RESPONSE TO INTERROGATORY NO. 24:

See general objection 4 and Union Carbide's responses to interrogatories 20, 22 and 39.

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INTERROGATORY NO. 25:

State the following:

a) the address(es) where the corporate records of THIS DEFENDANT (including minutes from the Board of Directors meetings and corporation annual reports), are currently located;

b) the IDENTITY of the custodian of such records.

RESPONSE TO INTERROGATORY NO. 25:

See general objection 4. Union Carbide's corporate records are kept at:

Union Carbide Corporation
39 Old Ridgebury Road
Danbury, Ct. 06817

Union Carbide's asbestos-related business documents are kept and maintained by Union Carbide's custodian of records, Mrs. Vina Shatah, Kelley Drye & Warren, Six Stamford Forum, Stamford, Connecticut 06901.

INTERROGATORY NO. 26:

Describe the packaging or containers in which THIS DEFENDANT sold and/or distributed RAW ASBESTOS FIBER, including composition, dimension, shape and color.

RESPONSE TO INTERROGATORY NO. 26:

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

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Calidria asbestos was mostly transported in plastic or Kraft type paper bags, although some Calidria had been shipped in bulk in railroad hopper cars. Each bag contained the following information: Union Carbide's corporate name and address, the net weight of material supplied, the applicable grade of asbestos, the lot number identification, and, starting in 1968 a cautionary statement. At the request of some customers, a limited amount of Calidria asbestos was sold in plain Kraft bags, which contained only the cautionary statement. Unless the customer requested otherwise, between approximately the mid-1970's and June 1985 all Kraft bags containing Calidria asbestos were individually shrink wrapped (encased by a tight fitting plastic film); an entire pallet containing a number of such bags was also completely covered with the tight fitting plastic film.

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

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INTERROGATORY NO. 27:

Describe any logo, design, marking or printing, including size and color, which appeared on the packaging or containers in which THIS DEFENDANT sold and/or distributed RAW ASBESTOS FIBER.

RESPONSE TO INTERROGATORY NO. 27:

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

Subject to its objections, Union Carbide responds as follows:

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

INTERROGATORY NO. 28:

Describe the packaging or containers in which THIS DEFENDANT sold and/or distributed ASBESTOS-CONTAINING PRODUCT(S), including composition, dimension, shape and color.

RESPONSE TO INTERROGATORY NO. 28:

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

INTERROGATORY NO. 29:

Describe any logo, design, marking or printing, including size and color, which appeared on the packaging or containers in which THIS DEFENDANT sold and/or distributed ASBESTOS-CONTAINING PRODUCT(S).

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RESPONSE TO INTERROGATORY NO. 29:

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

INTERROGATORY NO. 30:

Does THIS DEFENDANT have any exemplar(s) of packaging or containers in which its RAW ASBESTOS FIBER and/or ASBESTOS-CONTAINING PRODUCT(S) were sold and/or distributed? If so, state:

a) the location of each exemplar;

b) the year(s) in which said exemplar(s) was utilized;

c) the IDENTITY of the custodian of such exemplars.

RESPONSE TO INTERROGATORY NO. 30:

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

Union Carbide sold its Calidria business in 1985. However, Union Carbide possesses an exemplar of at least one unused Calidria package. Upon plaintiff's request, Union Carbide will make such exemplars of its Calidria packaging, which it has in its possession, for review and replication at a suitable time and place. The exemplar or exemplars are presently in the possession of Union Carbide's custodian of documents, Mrs. Vina Shatah, Kelley Drye & Warren, Six Stamford Forum, Stamford, Connecticut 06901.

INTERROGATORY NO. 31:

Did THIS DEFENDANT put warnings of asbestos-related

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health hazards on bags of RAW ASBESTOS FIBER? If so, please state:

a) the working of such warning(s), including size, location, and color;

b) whether the warning was put on a tag attached to the bags;

c) the date such warning(s) was first used;

d) whether any change was made in the wording of such warnings, the date(s) of such change, and the reasons for such change.

RESPONSE TO INTERROGATORY NO. 31:

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

INTERROGATORY NO. 32:

Did THIS DEFENDANT put warnings of asbestos-related health hazards on the packaging or containers of ASBESTOS-CONTAINING PRODUCT(S)? If so, please state:

a) the wording of such warnings, including size, location on the packaging or containers, and color;

b) the date such warning(s) was first used;

c) whether any change was made in the wording of such warning(s), the date(s) of such change, and the reason(s) for such change.

RESPONSE TO INTERROGATORY NO. 32:

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

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INTERROGATORY NO. 33:

Has THIS DEFENDANT distributed any brochures or pamphlets that contain warnings of any asbestos-related health hazards; if so, please state:

a) the wording of such warning;

b) the method used to distribute such brochures or pamphlets;

c) the date(s) such brochures or pamphlets were first issued;

d) whether THIS DEFENDANT has exemplar(s) of such brochures or pamphlets;

e) the IDENTITY of the custodian of such exemplar(s).

RESPONSE TO INTERROGATORY NO. 33:

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

See Union Carbide's response to interrogatory no. 26. During the early days of Union Carbide's Calidria business (which began in 1963), 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

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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; and starting 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. Harry Rhodes, an industrial hygienist, supervised Union Carbide's dust monitoring program.

Upon plaintiff's request, Union Carbide will make copies of results of such dust counts available to the

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plaintiff for review and duplication at a suitable time and place.

Starting September 1, 1972 Union Carbide distributed Material Safety Data Sheets setting forth precautions and instructions for the proper and safe use of Calidria. In addition, listed below are brochures and documents which have been made available by Union Carbide to Union Carbide's Calidria customers, many of which contained information on potential hazards associated with excessive asbestos exposure and information as to how to control or avoid such hazards. Since Union Carbide sold the Calidria business in 1985, the material listed below has not been in use by Union Carbide. Except where the dates are stated herein, the time of publication and the author of each item is presently unknown.

I. GENERAL

A. "Calidria" Booklet, John Crane

B. Asbestos Fibers, R. Byrne

C. Business Reply Card, John Crane

D. Rubber Booklet, John Crane

E. Grinding Asbestos Pellets, R. Byrne

F. FDA Status - Asbestos in Paper.

G. New Additives Induce Thixotrophy - Reprint of John Myers Speech.

H. New Idria Chrysotile an Unusual Ore Yields. New Products, R. Woolery

I. Cationic Asbestos for Waste Water Treatment, John Myers

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J. Asbestos Products for Oil Pollution Control, John Myers

K. Zeta Potentials of Some Minerals.

L. US Patent Office - Waste and Water Treatments, R. Woolery

M. Mineralogy of the Coalinga Asbestos Deposit, Mumpton and Thompson

N. Bulk Handling Demonstration

O. Electron Micrograph Illustrations.

P. Asbestos Magazine Reprinting - John Myers - Pellets.

Q. Rubber World Reprint.

R. Suggested Primer Sealer for Masonry and Weathered Roofing, 3JG-123B.

S. Suggested Exterior White Hi-Build Flexible Coating, 3JG-124B.

T. Suggested Exterior White Insulating Roof Coating, 3JG-121B.

U. Suggested Weather-Barrier Roof Coating and Lagging Compound, E-1297.

II. <u>RESIN GRADE PRODUCTS</u>

A. General.

1. "Calidria" RG-144 & RG-244, John Myers
2. Use of Cowles Dissolver, R. E. Byrne
3. "Calidria" RG Products for Vinyl Plastisol Sealant Applications.

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4. "Calidria" Asbestos for a High Build Dip Coating Plastisol NF-12.

5. "Calidria" RG-144 & RG-244 Asbestos in PVC Plastisols.

6. Rubber Research Elastomerics.

7. Plasticizer Viscosity Control with "Calidria" Asbestos RG-244 & RG-144.

B. RG-110 (Price Schedule).

1. Viscosity Control Agent for Asphaltic Compounds.

2. Polyester Premixes Comparative Cost & Performance Data.

C. RG144 (Price Schedule).

1. RG-144 Brochure, John Crane

2. RG-144 Performance Data, John Crane

3. RG-144 Product Characteristics.

4. RG Asbestos Improves Thixotrophic Properties of Highway Markers.

5. PVP Reprint.

6. Asbestos Beefs Up Plastics & Adhesives to Extend Their Use.

D. RG-244 (Price Schedule).

1. RG-244 Brochure, John Crane

2. RG-244 Comparative Performance Characteristics, John Crane

3. RG-244 Product Characteristics & Specifications.

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4 Ultrasonic Dispersion of RG-244, B. L. Ingalls

5. RG-244 as a Thixotrope for Polyester Resins, B. L. Ingalls

6. Polyester Putty & Patching Compounds.

7. "Epoxy Coal Tar Coatings."

8. "Chlorinated Rubber Roofing Compound", B. L. Ingalls

9. High Build Vinyl Maintenance Paints.

10. Zinc-Rich Primers.

11. Vinyl Coal Tar Formulation Suggestions.

12. Formulating Plastisol Sealants with Silane Adhesion Promoters.

13. RG-244 Health Brochure.

E. RG-600 Brochures.

1. Cost Effectiveness Optimization of Reinforced Polyolefins; 10/4/76 (Ancker & Leung).

2. RG-600 Inquiry Form, John Crane

3. Coupled Chrysotile Asbestos Reinforced Thermoplastics (Ancker).

4. RG-600 Request Form, John Crane

5. RG-600 Patent Literature - 3,939,278; December 23, 1975.

6. RG-600 Health Brochure.

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7. Reinforced Polyolefins for Large Structural Foam Parts; 2/8-11/77, Michno

8. Structural Foam is Launched into an Era of Great Diversification; August 1976.

III. STANDARD GRADE PRODUCTS

A. General.

1. "Calidria" Asbestos Standard Grade Products, Typical Properties, John Myers

B. SG-100 (Price Schedule).

1. SG-100 "Calidria" Asbestos for Use in Vinyl and Asphalt Floor Coverings.

2. SG-100 Saves Up to One-Half (12) the Amount of Asbestos.

3. Flintkote Report.

C. SG-130 (Price Schedule).

D. SG-200SG200X (Price Schedule).

E. 1. SG-200SG-200X Product Characteristics.

F. 2. TJC Brochure.

3. UCAR Latex 153 for Water-Based Caulks and Sealants.

4. Typical Product Characteristics and Specifications SG-210.

5. Suggested Interior Texturing or Exterior Spackling Formulation (17-CHR-41).

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IV. HIGH PURITY

A. General.

1. Effects of Chrysotile Asbestos Additions to Cellulosic Paper - RGW.

2. "Calidria" High Purity Asbestos for Porosity Control, Pinhole Reduction, and Improvement in Two-Sidedness.

3. Properties of Asbestos Suitable for Use in Cellulosic Paper, Naumann.

4. How High Purity Asbestos is Used for Pitch Control in Papermaking, Woolery.

5. Paper Trade Journal - Asbestos Product Aids Retention, Boosts Opacity and Disperses Pitch, Ingalls.

6. "Calidria" Asbestos for Paper Coatings.

B. High Purity Open (Price Schedule for HOP & HPP).

1. Typical Product Characteristics for HPO, John Myers.

2. The Trial of Calidria HOP in New Rochelle Water Pollution Control Plant.

3. Addition Rates for HOP in Primary Waste Treatment, John Myers.

4. Suggested Dark Green Acrylic Tennis Court Topcoat E-1400.

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C. High Purity Pellets.

1. Typical Product Characteristics for HPP, John Myers.

V. TITANATED PRODUCTS

A. T-135 (Price Schedule).

1. T-135 Opacifying Agent.

2. "Calidria" Asbestos T-135 for Viscosity Control & Pigmentation.

3. T-135-0 for Spray Acoustic & Texture Compounds.

4. Chemical 26 Reprint - Checking Opacity.

VI. COATING GRADES

A. CG-135 (Price Schedule).

VII. DRILLING

A. Oil and Gas Journal Reprint.

In addition, the following material, some of which is listed above in the form of brochures, articles or addresses, has been prepared:

1. "Calidria Asbestos RG-244 - An Economical Effective Thickener and Thixotrope for Polyester Resins, Plastisols, Epoxies, Phenolic Adhesives Organosols" 9/70.

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2. "CALIDRIA Asbestos, Resin-Grade 144, An Effective Low Cost Thickening Agent and Thixotrope for Epoxy Resin Systems" - 7/71, John Crane.

3. "CALIDRIA Asbestos Resin-Grade - 144 and Resin-Grade 224", John Myers.

4. "CALIDRIA Asbestos, Low Cost Highly Effective Reinforcer and Filler for Rubber, Two Grades: High-Purity and T-135" - 10/70, John Crane.

5. "CALIDRIA Asbestos, a Unique and Versatile Fiber With Proven Applications as an Extender, Thickener, Reinforcer, Opacifier" 574.

6. "New Additives Induce Thixotrophy, Provide Sag and Viscosity Control," presented by John L. Myers to Western Coatings Technology Society Meetings in Denver, Los Angeles, San Francisco, Portland, Seattle, and Vancouver, in May 1969.

7. "Asbestos," by Robert E. Byrne, Jr., Area Manager, CALIDRIA Asbestos Marketing and Technology, Mining and Metals Division, Union Carbide

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Corporation, published March, 1972 in Modern Plastics Encyclopedia, McGraw-Hill, Inc.

8. "Calidria Asbestos Pellets" by John L. Myers, Former Product and Production Manager for Union Carbide's Calidria Operation, published October 1971 in Asbestos, reprinted by Union Carbide.

VIII. HEALTH AND SAFETY

A. General.

1. "Material Safety Data" for CALIDRIA Asbestos published September 1, 1972 and revised September 1, 1976 by Union Carbide Corporation.

2. "Chrysotile Asbestos in Plastics," presented May 14, 1974 at the 32nd annual technical conference of the Society of Plastics Engineers at San Francisco, by John L. Myers, Marketing Manager, Asbestos, Union Carbide.

3. "Handling Asbestos - Chrysotile Asbestos in Plastics," June 16, 1975, by John L. Myers, Marketing Manager Asbestos Union Carbide.

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4. "Grinding CALIDRIA Asbestos Pellets," by Robert E. Byrne, Jr., Area Manager, CALIDRIA Asbestos, Marketing and Technology, Mining and Metals Division, Union Carbide Corporation.

5. Brochure "'Calidria' Asbestos Pellets Health and OSHA Information" Published November 1, 1977 by Metals Division, Union Carbide Corporation, Niagara Falls, New York.

6. "Consumer Safety in Plastics System Containing Bound Asbestos Fibers presented on November 9, 1977 at the NATEC Meeting of the Society of Plastics Engineers at Denver by Dr. H.B. Rhodes, Manager Marketing Services-Asbestos, Union Carbide.

7. "What You Should Know About Asbestos and Health," published by the Asbestos Information Association, disseminated by Union Carbide.

B. RG-244.

1. Brochure "'CALIDRIA' Asbestos RG-244 - Health and OSHA Information," published February 1, 1975 and revised October 1, 1977 by Marketing and Technology

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Department, Mining and Metals Division, Union Carbide Corporation, Niagara Falls, New York.

2. "'CALIDRIA' Asbestos RG-244 - Typical Chemical Analysis," date of publication unknown.

IX. AIA MATERIAL

A) In addition to the above, Union Carbide made the following documents and brochures, which were prepared and published by the Asbestos Information Association, available to Calidria customers:

1. Testimony by George W. Wright, M.D. before U.S. Dept. of Labor, Occupational Safety & Health Hearing on Proposed Occupational Asbestos Standard, March 14-17, 1972.

2. Testimony by J. Corbett McDonald, M.C. - same as above.

3. OSHA Regulations - 6/7/72.

4. EPA Regulations - 4/6/73.

5. NY Times Article and Rebuttals (Article - 1/21/73, Rebuttals - 2/25/73).

6. AIA Response to the Wall Street Journal - 6/15/72.

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7. "Airborne Asbestos" National Research Council, 1971.

8. "Airborne Asbestos" - Summary.

9. "Airborne Asbestos" - References.

10. Asbestos Bulletin (Asbestos Information Committee, London - 9/72).

11. CIBA GEIGY - UK 2/72.

12. QAMA Folder

13. WHO Report - 10/72

14. Target Health Hazard Fact Sheet (SILICA)

15. "Asbestos Has Its Defenders" - The Journal of Commerce, 4/20/73

16. "The Familiar Aroma of Panic" - Editorial, Plastics Technology 3/73

17. Dust Counting - S. G. Bayer, R. D. Zummalde, T. A. Brown - Feb. 1969 U.S. Dept. of Health, Education and Welfare

18. Dust Monitoring Equipment & Costs - 2/19/73

19. AIA - "Protecting The Asbestos Worker"

20. AIA - "Asbestos and Health"

21. AIA - "The Asbestos Information Association/North America"

22. AIA - "Asbestos and Health Questions and Answers"

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23. AIA - "What Asbestos Is: How and Where It Is Used"

24. The Northern Miner - "Asbestos Completely Exonerated etc." - 4/19/73

25. Partnership for Prevention - "The Insulation Industry Hygiene Research Program" - 4/70

26. Asbestos - Reprint from National Safety News - 10/73

27. AIA Answer to TIME magazine - 2/1/74

28. AIA/"What Every Employee Should Know About Asbestos" -2/74

29. AIA Response to "Consumers Research" - 1/28/74

30. "Asbestos Health Question Perplexes Experts," C&EN - 12/10/73

31. Disputes on the Safety of Asbestos - New Scientist 3/7/74

32. JLM Speech (SPE Paper)

33. RG-244 Health Booklet

34. Asbestos in the Atmosphere - AIA/NA

35. Asbestos in Water - AIA/NA

36. Asbestos & Silica Dust in the Drywall Industry. Part 1 - Nov/Dec. 1975, Dr. Rhodes.

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37. Asbestos & Silica Dust in the Drywall Industry. Part 2 - Jan./Feb. 1976, Dr. Rhodes.

38. Detection of Chrysotile Asbestos in Airborne Dust from Thermosetting Resin Grinding. 1975, Faulring.

39. AIA/NA Molding & Fabrication of Asbestos-Containing Plastic Products, Work Practices

40. Instructions for Sampling of Airborne Asbestos Fibers

41. Procedure for Pump Calibration used for Monitoring of Asbestos Dust Emissions

B) The following information pamphlets were mailed to Calidria customers beginning in 1977:

1. "Calidria Asbestos SG-130 and SG-210" sales brochure (1968).

2. "Safe Use of Calidria RG244" (February 1973).

3. "Calidria Asbestos RG-600 Health and OSHA Information" (February 1, 1975).

4. "Calidria Asbestos RG 244 Health and OSHA Information" (October 1, 1977).

5. "Calidria Asbestos Pellets Health and OSHA Information" (November 1, 1977).

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6. Letter to Calidria Customers with health and safety enclosures (October 24, 1977).

7. Letter to Calidria distributors with health and safety enclosures (September 10, 1979).

8. Letter to Calidria customers with health and safety enclosures (August 20, 1979).

9. Letter to Calidria Customers with health and safety enclosures (October 1, 1980).

10. Letter to Calidria Customers with health and safety enclosures (November 23, 1981).

11. Letter to Calidria Customers with health and safety enclosures (December 9, 1981).

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

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statement read as follows: "Caution. Contains asbestos fibers. Avoid creating dust. Breathing asbestos dust may cause serious bodily harm."

Union Carbide's custodian of records is Mrs. Vina Shatah, Kelley Drye & Warren, Six Stamford Forum, Stamford, Connecticut 06901.

INTERROGATORY NO. 34:

Did THIS DEFENDANT warn its employees and/or CONTRACT UNIT(S), anywhere in the United States, that exposure to asbestos could be hazardous to human health? If so, state:

a) whether copies of DOCUMENTS containing such warnings exist;

b) the IDENTITY of the custodian of such DOCUMENTS.

RESPONSE TO INTERROGATORY NO. 34:

See general objections 4 and 5. Union Carbide objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, vague and ambiguous and not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 35:

State the IDENTITY of medical directors and/or industrial hygienists retained by THIS DEFENDANT in the United States.

RESPONSE TO INTERROGATORY NO. 35:

See general objection 4. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, oppressive and harassing, irrelevant,

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immaterial, and unlikely to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Union Carbide's Medical Department was formally organized in 1938. Prior to that Union Carbide and Union Carbide facilities consulted physicians as appropriate upon need. The medical directors at Union Carbide have included the following individuals for the years respectively indicated below:

(1) Girard Cranch [1938-1945]

(2) Thomas Nale [1945-1963]

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

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

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

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

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

Union Carbide's various divisions employ Industrial Hygienists for their respective facilities and premises. C.C. Smith currently serves as Vice President in charge of Union Carbide's of Community and Employee Health, Safety and Environmental Protection Department which is primarily responsible for establishing corporate HS&EP standards and for assessing business group performance against those standards and applicable governmental requirements. During the period of the Calidria business, Dr. Harry Rhodes, an industrial hygienist, supervised Union Carbide's dust count program. See Union Carbide's response to interrogatory no. 39.

INTERROGATORY NO. 36:

Has any employee of THIS DEFENDANT testified by deposition on behalf of THIS DEFENDANT in a third-party case, brought in the United States, wherein the plaintiff has alleged an asbestos-related injury? If so, for each such third party case, please state:

a) the caption and case number;

b) the court of filing including state and county;

c) the date of deposition;

d) the name and address of plaintiff's counsel of record.

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RESPONSE TO INTERROGATORY NO. 36:

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

Union Carbide has presently identified the following testimony offered in asbestos-related law suits by Union Carbide employees:

1) John L. Myers

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

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

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

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

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

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

2) Carl U. Dernehl, M.D.

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

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

3. Robert E. Peele

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

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

C) Freda K. Knight v. Union Carbide Corporation, U.S.D.C. Southern District of West Virginia, Huntington, W.VA., Civil Action No. 84-3425, May 22, 1987.

4) William Paul Woods

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

5) Richard J. Sexton, M.D.

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

6) Bert K. Barton

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

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

7) Thomas J. Hall, M.D.

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

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8) Howard Stephens

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

9) Myron Bennett

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

10 Harrison B. Rhodes, PhD.

A) Marie B. Soignet v. Montello, Inc., et al., U.S.D.C. for Eastern District of Texas, Beaumont Division, B-86-1193-CA, January 19, 1989.

INTERROGATORY NO. 37:

Has THIS DEFENDANT been a member of the following:

a) Asbestos Textile Institute (ATI);

b) Industrial Hygiene Foundation and/or Industrial Health Foundation (IHF);

c) Mineral Wool Institute;

d) Industrial Mineral Insulation Manufacturers Institute;

e) Magnesia Silica Insulation Manufacturers Association;

f) National Insulation Manufacturers Association (NIMA);

g) Thermal Insulation Manufacturers Association (TIMA);

h) Asbestos Information Association (AIA);

i) Quebec Asbestos Mining Association (QAMA);

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j) National Safety Council;

k) Asbestos Cement Producers Association;

l) Refractories Institute;

m) any other organization or associations of manufacturers, miners, distributors, importers, labellers, suppliers and/or sellers of ASBESTOS-CONTAINING PRODUCTS;

(i) please state the name(s) of such organizations or associations.

RESPONSE TO INTERROGATORY NO. 37:

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

Union Carbide was a member of the Industrial Health Foundation, the American Industrial Health Association and Asbestos Information Association/North America. Union Carbide may also have cooperated with work undertaken by the Pneumoconiosis Research Council of the United Kingdom, The Organization Resources Recovery Organization, and the Insulation Industry Hygiene Research Program. Union Carbide or Union Carbide personnel also participated in activities of the National Safety Council. Union Carbide has no presently available record of association with any other organization listed in the plaintiff's interrogatory.

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possesses files which may contain miscellaneous correspondence to or from the AIA or other organizations. Upon the plaintiff's request, Union Carbide will make such relevant, non-privileged files available for review and duplication at a suitable time and place.

INTERROGATORY NO. 39:

Has THIS DEFENDANT received any DOCUMENT(S) containing results or conclusions of any studies and/or tests conducted by the Saranac Laboratory at the Trudeau Foundation relating to the human health consequences of exposure to asbestos? If so, please:

a) IDENTIFY all such DOCUMENT(S);

b) state the date upon which THIS DEFENDANT first received such DOCUMENT(S);

c) the IDENTITY of the custodian of such DOCUMENT(S).

RESPONSE TO INTERROGATORY NO. 39:

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

Other than published material available to the general public and documents produced in other law suits by parties other than Union Carbide, Union Carbide has not been able to locate any documents that contain any results or conclusions of any studies and/or tests conducted by the Saranac Laboratory at

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INTERROGATORY NO. 38:

For each organization, association or other entity identified in your Response to Interrogatory No. 37, please state:

a) the dates during which THIS DEFENDANT was a member;

b) the name(s) of any publication(s) received by THIS DEFENDANT from such association or organization;

c) the name of such committee or subcommittee of which THIS DEFENDANT was a member, and the dates of such committee or subcommittee membership.

RESPONSE TO INTERROGATORY NO. 38:

See general objection 5. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide further objects to this interrogatory on the grounds that it is not limited by time or subject matter to information that is relevant to this case. Subject to its objections, Union Carbide responds as follows:

See Union Carbide's response to interrogatory no. 37. Union Carbide responds that it presently can find no documents relating to the IHF in its files. With respect to AIA documents, see Union Carbide's response to interrogatory no. 39. Union Carbide also has in its possession a copy of at least one edition of the newsletter published by the Insulation Industry Hygiene Research Program. In addition, Union Carbide

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the Trudeau Foundation relating to the human health consequences of exposure to asbestos.

INTERROGATORY NO. 40:

State whether THIS DEFENDANT has ever maintained a library (or libraries) in the United States which contains books, articles, periodicals, journals and/or reference materials that relate to the subjects of asbestos, industrial hygiene, medicine, safety, occupational disease and/or engineering? If so, state:

a) the date each such library was established;

b) the location of each such library:

c) the IDENTITY of each librarian or other person in charge of such library.

RESPONSE TO INTERROGATORY NO. 40:

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

During the early 1960's, Union Carbide established and maintained a medical library. In December, 1981, the medical library merged into the general corporate library, located in Union Carbide's World Headquarters: Union Carbide Corporation; 39 Old Ridgebury Road; Danbury, Connecticut 06817. The chief librarian of the corporate library is Mr. Roger Miller. In 1983, Union Carbide's medical department organized its own

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library, located also in Union Carbide's World Headquarters, but apart from the corporate library. The medical library is presently overseen by Mr. Marvin Huffman.

Some medical-related material may presently be located at one of Union Carbide's "satellite" libraries; the following is a list of satellite libraries:

Union Carbide Corporation
Parma Technical Center
Technical Information Service
P. O. Box 6116
Cleveland, Ohio 44101

Chemical Hygiene Fellowship
Carnegie-Mellon Institute of Research
4400 Fifth Avenue
Pittsburgh, Penna. 23513

Union Carbide Corporation
Chemical & Plastics
Library, Bldg. 770
P. O. Box 8361
South Charleston, W. Va. 25303

Union Carbide Corporation
CTS Info. Center Office
Spine Bldg. 02, Sect. 15-16
Tarrytown Technical Center
Tarrytown, N.Y. 10591

Union Carbide Corporation
Chemical & Plastics, Bldg. 740
South Charleston Tech. Center
P. O. Box 8361
South Charleston, W. Va. 25303

Union Carbide Corporation
Tarrytown Technical Center
Library and Tech. Info. Serv.
Tarrytown, N.Y. 10591

Union Carbide Canada Ltd.
Plastics and Chemicals
Technical Center Library
P. O. Box 700, Pt. Aux Trembles
Quebec, H1B 5K8, Canada

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Union Carbide Canada Ltd.
Reference Library
123 Eglinton Avenue, E.
Toronto, Ontario M4P1J3
Canada

Union Carbide Corporation
Chemical & Plastics
Library
Tech. Info. Service
Bldg. 200
Bound Brook, N.J. 08805

Union Carbide Corporation
Chemical & Plastics, Bldg. 200
South Charleston, Tech. Center
P. O. Box 8361
South Charleston, W. Va. 25303

Union Carbide Corporation
Law Department
Library
39 Old Ridgebury Road
Danbury, Connecticut 06817

Union Carbide Corporation
Linde Division
Technical Library
P. O. Box 44
Tonawanda, N.Y. 14150

Union Carbide Corporation
Linde Division
Technical Library
P. O. Box 24166 (1500 Polco St.)
Indianapolis, Indiana 46224

INTERROGATORY NO. 41:

Has THIS DEFENDANT exchanged documents containing the results of or communicated with any individual or other COMPANY regarding tests and/or studies of the relationship between the inhalation of asbestos fibers and development of disease(s); if so, please state:

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a) each individual or COMPANY with whom the information was exchanged or to whom it was communicated;

b) the date(s) of any such exchanges or communications;

c) the IDENTITY of the custodian of such documents.

RESPONSE TO INTERROGATORY NO. 41:

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

Union Carbide has no presently available record of such correspondence; Union Carbide may have interchanged such information indirectly through its organization affiliations, see Union Carbide's response to interrogatory no. 37. Upon plaintiff's request, Union Carbide will make non-privileged files containing asbestos-related correspondence available to the plaintiff for review and replication at a suitable time and place.

INTERROGATORY NO. 42:

Has any employee of THIS DEFENDANT testified before the Occupational Safety and Health Administration, the National Institute of Occupational Safety and Health, or any committee or subcommittee of the United States Congress on the inhalation

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of asbestos dust and the development of disease; if so, please state:

a) the entity before whom such testimony was given;

b) the date(s) and location(s) of such testimony;

c) the IDENTITY of the individual(s) who so testified;

d) whether any DOCUMENTS were presented to the entity before which testimony was given;

e) whether copies of DOCUMENTS presented were retained by THIS DEFENDANT;

(i) if so, state the IDENTITY of the custodian of the DOCUMENT(S).

RESPONSE TO INTERROGATORY NO. 42:

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

According to the best of Union Carbide's present information, the following testimony was provided by individuals formerly associated with Union Carbide in the capacities noted below, and not necessarily on Union Carbide's behalf; their testimony may or may not have pertained to Union Carbide or Union Carbide products:

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1. James W. Rawlings, Former Vice President, Metals Division.

3/16/72, Washington, D.C., before U.S. Department of Labor-OSHA hearings on a "Proposed Standard for Occupational Exposure to Asbestos."

2. John L. Myers, Product and Production Manager, Asbestos.

(i) 9/17/75 and 1/21-22/76, Washington, D.C., before the OSHA Advisory Committee on "Proposed Standards for Occupational Exposure to Asbestos in the Construction Industry."

(ii) 4/27/79, Fresno, California, California Occupational Safety and Health (CAL-OSHA) Standards Board regarding proposed changes in asbestos standards.

(iii) 8/30/79, San Diego, California, before the California Occupational Safety and Health (CAL-OSHA) Standards Board, regarding proposed changes in asbestos standards.

(iv) 5/29/80, Fresno, California, before the California Occupational Safety and Health (CAL-OSHA) Standards Board, regarding proposed changes in asbestos standards.

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3. Harrison B. Rhodes, former Technology Manager - Asbestos.

(i) 8/15/77, before the Consumer Product Safety Commission on "A Proposed Ban on Wall Patching Compounds Containing Asbestos."

(ii) 3/14/77, New Brunswick, N.J., before the New Jersey Department of Environmental Protection on "A Proposed Regulation Regarding Control and Prohibition of Spray-On Asbestos Surface Coatings."

(iii) 7/19/78, Washington, D.C., U.S. Department of Labor-OSHA, hearing on proposed rulemaking: "Identification, Classification and Regulation of Toxic Substances Posing a Potential Occupational Carcinogenic Risk."

(iv) 11/8/78, Sacramento, California, before the California Occupational Safety and Health (CAL-OSHA) Standards Board, regarding proposed changes in asbestos standards.

(v) 8/30/79 and 9/25/80, San Diego, California Occupational Safety and Health (CAL-OSHA) Standards Board, regarding proposed changes in asbestos standards.

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(vi) 2/19/81 and 8/14/81, Toronto, Ontario, Canada, Royal Commission on Matters of Health and Safety Arising from the Use of Asbestos in Ontario.

INTERROGATORY NO. 43:

At any of the physical facilities identified in the response to Interrogatory No. 15, has THIS DEFENDANT conducted, or caused to be conducted, tests and/or studies of ambient asbestos dust created during the manufacture, processing and/or assembling of ASBESTOS-CONTAINING PRODUCT(S)? If so, please state:

a) each manufacturing facility, including location and address, at which any such test and/or study was conducted;

b) the date of each such test and/or study;

c) the individual(s) or entity conducting each such test and/or study;

d) whether THIS DEFENDANT has any documents containing the results and/or conclusions of each such study;

e) the IDENTITY of the custodian of the documents.

RESPONSE TO INTERROGATORY NO. 43:

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

Union Carbide did conduct dust studies at various physical facilities and these studies upon plaintiff's request,

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will be made available to the plaintiff for review and duplication at a suitable time and place.

During the early days of Union Carbide's Calidria business (which began in 1963), 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; and starting in

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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. Harry Rhodes, an industrial hygienist, supervised Union Carbide's dust monitoring program.

Union Carbide's custodian of records is Mrs. Vina Shatah, Kelley Drye & Warren, Six Stamford Forum, Stamford, Connecticut 06901.

INTERROGATORY NO. 44:

Has THIS DEFENDANT conducted, or caused to be conducted, any tests and/or studies on ambient asbestos dust levels at any location or job site where its ASBESTOS-CONTAINING PRODUCTS were utilized in the United States; if so, please state:

a) the location, including name and address, at which each such test and/or study was conducted;

b) the individual(s) or entity conducting each such test and/or study;

c) the date of each such test and/or study;

d) whether THIS DEFENDANT has any DOCUMENTS containing the results and/or conclusions of each such test and/or study;

e) the IDENTITY of the custodian of these DOCUMENTS.

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RESPONSE TO INTERROGATORY NO. 44:

See general objection 4 and Union Carbide's response to interrogatory no. 43. Upon plaintiff's request, Union Carbide will make copies of results of such dust counts available to the plaintiff for review and duplication at a suitable time and place.

INTERROGATORY NO. 45:

Did THIS DEFENDANT have any laboratory or other facility anywhere in the United States at which it conducted, or caused to be conducted, any tests and/or studies of its ASBESTOS-CONTAINING PRODUCTS to measure the amount of asbestos dust generated by any use for which such products were designed; if so, please state:

a) the location, including name and address, at which each such test and/or study was conducted;

b) the individual(s) or entity conducting each such test and/or study;

c) the date of each such test and/or study;

d) whether THIS DEFENDANT has any DOCUMENTS containing the results and/or conclusions of each such test and/or study;

e) the IDENTITY of the custodian of such DOCUMENTS.

RESPONSE TO INTERROGATORY NO. 45:

See Union Carbide's responses to interrogatories 43 and 44.

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INTERROGATORY NO. 46:

Plaintiffs did not propound an Interrogatory No. 46.

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INTERROGATORY NO. 47:

Has THIS DEFENDANT notified in writing any individual or COMPANIES to whom it MARKETed RAW ASBESTOS FIBER and/or ASBESTOS-CONTAINING PRODUCT(S), anywhere in the United States, of the potential relationship between exposure to asbestos and disease; if so, please state:

a) the date(s) THIS DEFENDANT provided this information;

b) the means used for transmittal of such information;

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c) whether THIS DEFENDANT has any copies of any DOCUMENTS transmitting such information;

d) the IDENTITY of the custodian of such documents.

RESPONSE TO INTERROGATORY NO. 47:

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

See Union Carbide's response to interrogatory no. 33.

INTERROGATORY NO. 48:

Has THIS DEFENDANT required any individual(s) who MARKETed its ASBESTOS-CONTAINING PRODUCT(S) to wear respirators or face masks; if so, please state:

a) the job title(s), if known, of individual(s) required to wear respirators or face masks;

b) the date(s) on which THIS DEFENDANT first required the wearing of respirators or face masks;

c) the means by which the requirement to wear respirators or face masks was communicated;

d) whether THIS DEFENDANT has any copies of DOCUMENTS communcating such requirements;

e) the IDENTITY of the custodian of such DOCUMENTS.

RESPONSE TO INTERROGATORY NO. 48:

See general objections 4 and 5. Union Carbide also objects to this interrogatory on the grounds that it is overly

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

Union Carbide advised its customers, including distributors, of the availability of respirators approved by the Bureau of Mines, Department of Interior and the National Institute of Occupational Safety and Health (NIOSH) (as otherwise specified by the regulations of OSHA pursuant to 29 CFR 1910.1001). Such advice was contained in safety literature made available and disseminated to Calidria customers. See Union Carbide's response to interrogatory no. 33.

INTERROGATORY NO. 49:

Does or did THIS DEFENDANT utilize or employ any CONTRACT UNIT? If so, please state:

a) the inclusive periods of time the CONTRACT UNIT(S) was utilized or employed;

b) the business address and name of the CONTRACT UNIT(S);

c) whether THIS DEFENDANT has any DOCUMENTS showing the location(s) of the job site(s) where the CONTRACT UNIT(S) worked, and if so, state the IDENTITY of the custodian of such DOCUMENTS.

RESPONSE TO INTERROGATORY NO. 49:

See general objections 4 and 5. Union Carbide objects to this interrogatory on the grounds that it is overly broad,

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unduly burdensome, vague and ambiguous. Union Carbide further objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of the action or reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Union Carbide did not market thermal or frost insulation and was never in the business of installing for hire.

INTERROGATORY NO. 50:

Has THIS DEFENDANT received any written communication or other DOCUMENT, other than a claim for workers' compensation, that any person was claiming injury as a result of exposure to its RAW ASBESTOS FIBER and/or ASBESTOS-CONTAINING PRODUCT(S); if so, please IDENTIFY the first such written communication or DOCUMENT.

RESPONSE TO INTERROGATORY NO. 50:

See general objections 4 and 5. Union Carbide objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, vague and ambiguous. Union Carbide further objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of the action or reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Since 1979, Union Carbide has been named in law suits making such allegations.

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INTERROGATORY NO. 51:

Has any person filed a claim for asbestos-related injury regarding THIS DEFENDANT against any workers' compensation insurance carrier which provided coverage for THIS DEFENDANT; if so, please state:

a) the date of such claim;

b) the name of claimant;

c) the caption;

d) the case number;

e) the court in which the claim was filed;

f) the IDENTITY of the custodian of such documents.

RESPONSE TO INTERROGATORY NO. 51:

See general objections 4 and 5. Union Carbide also objects to this interrogatory on the grounds that no asbestos-related claim has ever been filed by employees of Union Carbide's Calidria mine and mill. One employee filed a claim for an unknown disease. Dr. Duane Hade, of King City, California, a non-Union Carbide physician who provided medical service to employees of the King City mine and mill, is familiar with this lack of asbestos related incidents.

INTERROGATORY NO. 52:

Has any person filed a workers' compensation claim for asbestos-related injury against THIS DEFENDANT; if so, please state:

a) the date of such claim;

b) the name of claimant;

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c) the caption;

d) the case number;

e) the court in which the claims was filed;

f) the IDENTITY of the custodian of such documents.

RESPONSE TO INTERROGATORY NO. 52:

See Union Carbide's response to interrogatory no. 51.

INTERROGATORY NO. 53:

Does THIS DEFENDANT have insurance available to cover judgment(s) entered against it in asbestos-related personal injury lawsuits; if so, please state:

a) the name and principal place of business of any insurance carrier who has issued such policy of insurance;

b) the number and effective date of each policy;

c) the amounts(s) of coverage of each policy;

d) the applicable dates of coverage;

e) any reservation of rights contained in each such policy;

f) the amount of coverage presently exhausted under each such policy;

g) the amount of coverage presently available under each such policy;

h) whether limits contained in such policy include costs of defense.

RESPONSE TO INTERROGATORY NO. 53:

See general objections 4 and 5. Union Carbide objects

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to this interrogatory on the grounds that it is overly broad, vague and ambiguous. Union Carbide further objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of the action or reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, and without making any admission with respect to the plaintiff's claims, Union Carbide responds as follows:

Union Carbide possesses sufficient insurance coverage to enable it to cover the plaintiff's claims.

INTERROGATORY NO. 54:

Has THIS DEFENDANT owned or operated any petroleum refining facilities; if so, please state:

a) whether any ASBESTOS-CONTAINING PRODUCT(S) WERE MARKETed on the premises of such refining facilities;

b) the location, including the name and address of all such refining facilities;

c) the dates of operation of such refining facilities;

d) the types of ASBESTOS-CONTAINING PRODUCT(S) MARKETed on such premises;

e) the names of the manufacturers of any ASBESTOS-CONTANING PRODUCTS MARKETed on such premises;

f) whether THIS DEFENDANT has documents identifying such MARKETing;

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g) the IDENTITY of the custodian of such documents.

RESPONSE TO INTERROGATORY NO. 54:

See general objection 4. Calidria was mined and milled at King City, California and never processed by Union Carbide through any petroleum refining facility.

INTERROGATORY NO. 55:

Has THIS DEFENDANT held a controlling ownership interest in any COMPANY which owned or operated petroleum refining facilities; if so, for the period(s) of time during which THIS DEFENDANT held such interest, please state:

a) whether any ASBESTOS-CONTAINING PRODUCTS were MARKETed on the premises of such refining facilities;

b) the location, including the name and address of all such refining facilities;

c) the dates of operation of such refining facilities;

d) the types of ASBESTOS-CONTAINING PRODUCTS MARKETed on such premises;

e) the names of the manufacturers of any ASBESTOS-CONTAINING PRODUCTS MARKETed on such premises;

f) whether THIS DEFENDANT has DOCUMENTS identifying such MARKETing;

g) the IDENTITY of the custodian of such DOCUMENTS.

RESPONSE TO INTERROGATORY NO. 55:

See Union Carbide's response to interrogatory no. 54.

INTERROGATORY NO. 56:

No Interrogatory No. 56 was propounded by plaintiff.

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INTERROGATORY NO. 57:

Has THIS DEFENDANT contracted with any COMPANY for the MARKETing of ASBESTOS-CONTAINING PRODUCT(S) on any premises owned or leased by THIS DEFENDANT; if so, please state:

a) the location, including name and address of such premises;

b) the name and address of each such COMPANY;

c) the types of ASBESTOS-CONTAINING PRODUCTS;

d) the name of the manufacturers of such ASBESTOS-CONTAINING PRODUCTS;

e) whether THIS DEFENDANT has DOCUMENTS of such MARKETing;

f) the IDENTITY of the custodian of such DOCUMENTS.

RESPONSE TO INTERROGATORY NO. 57:

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

Distributors accounted for approximately 25% of all Calidria sales. Union Carbide, however, no longer mines or sells Calidria and thus no longer maintains Calidria distributors. The following is a list of former Calidria distributors which Union Carbide has been able to identify:

Presently Known Former Calidria Distributors (1963-1985)

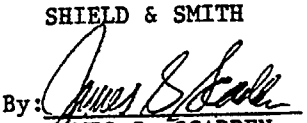
1) Allied Resin Corporation
2) American Industrial Chemical Corporation

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3) Bouffard Associates
4) A.T. Callas Company
5) D. & F. Distributing, Inc.
6) Harrisons & Crosfield (Canada)
7) Harrisons & Crosfield (Pacific)
8) Leverage Chemicals, Inc.
9) Technical Petroleum Company
10) Technical Products, Inc.
11) Montello, Inc.
12) Harwick Chemical Corp.
13) Platex, Inc.
14) Union Carbide International
15) Western Chemical & Manufacturing Company
16) Mc Kesson Chemicals, Inc.
17) Apperson Chemicals, Inc.
18) Amsco Division - Union Oil Company of Calif.
19) Hamblet & Hayes Co.
20) Marco Chemical Division - W. R. Grace & Company
21) Wonder State Industries
22) The Permult Co., Inc.
23) Van Waters and Rogers
24) Lenape Chemicals, Inc.

DATED: August 10, 1990

SHIELD & SMITH

By: 
JAMES G. SCADDEN
Attorney for Defendant
UNION CARBIDE CORPORATION

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(PROOF OF SERVICE BY MAIL -- 1013a, 2015.5 C.C.P.)

STATE OF CALIFORNIA)
) ss.
COUNTY OF SAN FRANCISCO)

I am employed in the aforesaid county; I am over the age of eighteen years and not a party to the within entitled action; my business address is: 580 California Street, Suite 1400, San Francisco, California 94104.

On 8/13/90, I served the within:

UNION CARBIDE CORPORATION RESPONSES TO PLAINTIFFS' FIRST SET OF INTERROGATORIES TO ALL DEFENDANTS (pursuant to General Order No. 30)

on the interested parties in said action,

✓ by placing true copies thereof enclosed in a sealed envelope addressed as stated on the attached mailing list:

SEE ATTACHED SOLANO COUNTY COMPLEX ASBESTOS COUNSEL SERVICE LIST

✓ I caused such envelope to be deposited in the mail at San Francisco, California. The envelope was mailed with postage thereon fully prepaid.

Execute on 8/13/90 at San Francisco, California.

✓ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

___ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Roberta M Aregger
ROBERTA M. AREGGER

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In Re: Comples Axbestos
Solano County Proof of Service 9/89