PLAINTIFF'S EXHIBIT

UC-5329

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ORIGINAL

NOV 24 1997

MARTINEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN FRANCISCO

IN RE:

COMPLEX ASBESTOS LITIGATION

Case No. 828684

UNION CARBIDE CHEMICALS AND PLASTICS COMPANY, INC.'S RESPONSE TO GENERAL ORDER #129 INTERROGATORIES

PROPOUNDING PARTY: PLAINTIFFS

RESPONDING PARTY: UNION CARBIDE CHEMICALS AND PLASTICS COMPANY, INC.

SET NUMBER: ONE

PRELIMINARY STATEMENT

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, 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.

Since plaintiff's interrogatories are not reasonably framed in terms of the facts and subject matter of the present action, Union Carbide cannot 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.

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

Plaintiffs have made no allegations of exposure to any asbestos-containing products, which Union Carbide has manufactured, sold or distributed where the asbestos fiber in those products was encapsulated by or embedded in other material. According to Union Carbide's best presently available information, those products consist of the following: a tree sprout inhibitor used primarily to inhibit growth on telephone poles; a phenolic molding compound used in electronic parts and products such as switches and radios; a thermoplastic molding material used primarily in camera cases; Prestone radiator products; acetylene cylinder liners; a scarfer machine used to remove blemishes and imperfections from steel; and, possibly, certain polyethylene, polystyrene and other products sold in limited quantities on an experimental basis. Union Carbide no longer manufactures any 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). All responses to these interrogatories refer to Calidria asbestos only.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY the person verifying these answers on YOUR behalf.

RESPONSE TO INTERROGATORY NO. 1:

John Macdonald, 39 Old Ridgebury Road, Danbury, CT 06817.

INTERROGATORY NO. 2:

State the date of first employment with YOU, and the dates and titles of each job position person verifying these interrogatories has held while employed by YOU.

RESPONSE TO INTERROGATORY NO. 2:

John Macdonald was first employed by Union Carbide Corporation in December 1969. The following is his job history:

1969-1979: Senior Analyst

1979-1982: Staff Assistant

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Secretary's Group

1982-present: Assistant Corporate Secretary

INTERROGATORY NO. 3:

State whether or not YOU are a corporation, and if so, state:

A. YOUR correct corporate name;

B. YOUR state of incorporation;

C. The date of YOUR incorporation;

D. The address of YOUR principal place of business;

E. Whether or not YOU have ever held a certificate of authority to do business in the State of California, and if so, the inclusive dates of any certificate;

F. If YOU are wholly owned or the majority interest of YOUR company is owned by another business entity, state the entity's name and principal place of business;

G. Whether YOU have any business offices in California and, if so, YOUR principal place of business in California.

RESPONSE TO INTERROGATORY NO. 3:

Yes.

A. Union Carbide Chemicals and Plastics Company, Inc.

B. New York.

C. November 11, 1917

D. 39 Old Ridgebury Road
Danbury, CT 06817

E. Yes. July 31, 1942 to the present.

F. Not applicable.

G. Union Carbide maintains one business office in California:

Union Carbide Corporation
19500 Mariner Avenue
Torrance, CA 90530-1590

See also Union Carbide response to Interrogatory 3D, above.

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INTERROGATORY NO. 4:

Have YOU ever been identified, known, or done business under any other name in the State of California?

RESPONSE TO INTERROGATORY NO. 4:

Yes.

INTERROGATORY NO. 5:

If your answer to Interrogatory No. 4 is in the affirmative, please state such name or names and the time period during which THIS DEFENDANT was so known or identified.

RESPONSE TO INTERROGATORY NO. 5:

Union Carbide Corporation was first incorporated in the State of New York on November 11, 1917 under the name of Union Carbide and Carbon Products. Union Carbide changed its name to Union Carbide Corporation in 1957; on July 3, 1989, to Union Carbide Chemicals & Plastics Co., Inc. [Union Carbide], which is wholly owned by the Union Carbide Corporation incorporated in Delaware.

INTERROGATORY NO. 6:

If YOU are not a corporation, what is YOUR business structure (partnership, joint venture, sole proprietorship, etc.).

RESPONSE TO INTERROGATORY NO. 6:

Not applicable.

INTERROGATORY NO. 7:

If YOU are not a corporation, please IDENTIFY all persons or other entities with an ownership interest in YOU.

RESPONSE TO INTERROGATORY NO. 7:

Not applicable.

INTERROGATORY NO. 8:

If you are not a corporation, please state the following:

A. The address where the HISTORICAL RECORDS of THIS DEFENDANT are currently located; and

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B. The name, job title and current address of the Custodian for THIS DEFENDANT'S HISTORICAL RECORDS.

As used herein, "HISTORICAL RECORDS" shall include all DOCUMENTS relating to the formation of THIS DEFENDANT, all minutes of partners', general partners', or other owners' meetings, and all DOCUMENTS relating to THIS DEFENDANT's merger with, acquisition of or purchase, or sale of or by any other COMPANY.

RESPONSE TO INTERROGATORY NO. 8:

Not applicable.

INTERROGATORY NO. 9:

IDENTIFY YOUR custodian of Business Records.

RESPONSE TO INTERROGATORY NO. 9:

Union Carbide's custodian of records for asbestos-related documents is Mrs. Virginia Ruszczyk, Kelley Drye & Warren L.L.P., 101 Park Avenue, New York, NY 10178.

INTERROGATORY NO. 10:

IDENTIFY the person or persons most knowledgeable about:

A. YOUR acquisition of RAW ASBESTOS and/or ASBESTOS CONTAINING PRODUCTS;

B. YOUR use of RAW ASBESTOS and/or ASBESTOS CONTAINING PRODUCTS;

C. YOUR contracting with others to do work involving use or handling of RAW ASBESTOS or ASBESTOS CONTAINING PRODUCTS.

RESPONSE TO INTERROGATORY NO. 10:

Union Carbide's Calidria asbestos was not an asbestos-containing product. Rather it was a unique short-fiber chrysotile asbestos sold in fibrous and pelletized forms to producers and manufacturers for use in their products and production processes. Union Carbide did cease selling Calidria and sold its Calidria business and assets in 1985.

John Myers has been involved in various aspects of Union Carbide Corporation's Calidria asbestos business since 1966, and has familiarity with many facets of the business and

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of the Calidria product. From 1970-1981, Mr. Myers held the Metals Division position of Marketing Manager- [for] asbestos. From 1981 until June 30, 1985, he served in the Metals Division as Product and Production Manager-[for] asbestos. John Myers is no longer employed by Union Carbide. Dr. Thomas Hall preceded John Myers and was involved in the start up of the Calidria operation. Former Calidria salespersons, presently in touch with Union Carbide include Mr. Bob Byrne and Mr. Jack Walsh. Further, Fred Mumpton and Slim Thompson were geologists with Union Carbide who developed the Calidria mine site.

INTERROGATORY NO. 11:

For DEFENDANTS involved in the MARKETING of ASBESTOS-CONTAINING PRODUCTS, state the IDENTITY of physicians, medical directors and/or industrial hygienists employed by YOU during the time frame or prior to the time YOU discontinued the marketing of such products. All other DEFENDANTS need only respond as to medical directors and/or industrial hygienists or physicians employed in the area of employee health and safety. PREMISES owners and domestic corporations need only respond as to the United States.

RESPONSE TO INTERROGATORY NO. 11:

Union Carbide's Calidria asbestos was not an asbestos-containing product. Rather it was a unique short-fiber chrysotile asbestos mined by Union Carbide and sold in fibrous and pelletized forms to producers and manufacturers for use in their products and production processes.

Union Carbide's Medical Department was formally organized in 1939. 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	(4)	Thomas A. Lincoln
	[1938-1945]		[1978-1985]
(2)	Thomas Nale	(5)	T. Guy Fortney
	[1945-1963]		[1985-1989]

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

(6) Jean B. Case [1989-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.

In addition, Dr. Hilton Lewinsohn served 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. Ronald Van Mynen currently serves as Vice President in charge of Union Carbide's 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. Harrison Rhodes, an industrial hygienist, supervised Union Carbide's dust count program.

INTERROGATORY NO. 12:

Has any employee of THIS DEFENDANT testified by deposition or at trial on behalf of THIS DEFENDANT in a third-party case, in which THIS DEFENDANT was a party, wherein the plaintiff has alleged an asbestos-related injury? If so, for each such third-party case (except

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that Premises Defendants and Contractor Defendants need answer only with respect to cases relating to sites within the GEOGRAPHIC AREA) please state:

A. The caption and case number;

B. The court filing including state and county;

C. The date of deposition or trial testimony;

D. The name and address of plaintiff s counsel of record;

E. The name and address of the court reporter.

RESPONSE TO INTERROGATORY NO. 12:

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-Teed 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.

F) James W. Manisto v. American Brake Block District Court, First Judicial District, State of Minnesota, County of Dakota, File No. C-5-88-1008, January 6, 1989.

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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.

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.

C) Arthur A. Frehse v. Anchor Packing Company et al., Sixth Judicial District, County of Carlton, State of Minnesota, March 10th, 1989.

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.

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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.

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, Ph.D.

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.

B) June Greer, Individually, and as Exec. of the Estate of John Lee Greer, U.S.D.C. for Northern District of Georgia, Atlanta Division, Civil Action No. CV 86-2882, August 10, 1989.

11) Dr. Hilton C. Lewinsohn

A) Marie B. Soignet v. Montello, et al
District Court for the Eastern District of Texas,
File No. B-86-1193, March 9, 1989.

B) Conwed Corporation v. Union Carbide Chemicals and Plastics Company, Inc., District Court for the Eastern District of Pennsylvania, Case No. 5-92-88, February 15, 1994

12) Newton H. Ketcham

A) State of West Virginia,
Circuit Court of Monogalia County, West Virginia,
File No. 86-C-458, November 8, 1991.

B) Russell Allen, et al v. American Petrofina, et al.
District Court of Jefferson County, Texas,
File No. B-126,986, December 8, 9, 10, 1992.

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INTERROGATORY NO. 13:

For each of the following, please state whether, at any time within the time frame or until such time as any defendant which had been engaged in MARKETING RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS discontinued the MARKETING of such products, DEFENDANT was a member or paid dues for any representative of THIS DEFENDANT (excluding faculty members of educational institutions) to be a member of the following:

A. American Conference of Governmental Industrial Hygienists;

B. American Industrial Hygiene Association;

C. American Petroleum Institute;

D. American Railroad Association;

E. Asbestos Cement Producers Association;

F. Asbestos Information Association (AIA) (please answer through date of your answers);

G. Asbestos Information Association/North America (AIA/NA)(please answer through date of your answers);

H. Asbestos Textile Institute (ATI);

I. Industrial Hygiene Foundation and/or Industrial Health Foundation;

J. Industrial Mineral Insulation Manufacturers Institute;

K. Magnesia Insulation Manufacturers' Association;

L. Magnesia Silica Insulation Manufacturers Association;

M. Mineral Wool Institute;

N. National Insulation Manufacturers Association (NIMA);

O. National Safety Council;

P. New York Academy of Sciences;

Q. Quebec Asbestos Mining Association (QAMA);

R. Refractories Institute;

S. Safe Building Alliance (please answer through date of your answers);

T. Thermal Insulation Manufacturers Association (TIMA);

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U. U.S. Maritime Commission;

V. IDENTIFY any other organizations, associations or groups of manufacturers, miners, distributors, importers, labelers, suppliers, and/or sellers of ASBESTOS-CONTAINING PRODUCTS of which THIS DEFENDANT was a member,

W. IDENTIFY any such representative of THIS DEFENDANT.

RESPONSE TO INTERROGATORY NO. 13:

Union Carbide's Calidria asbestos was not an asbestos-containing product. Rather it was a unique short-fiber chrysotile asbestos sold in fibrous and pelletized forms to producers and manufacturers for use in their products and production processes.

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 plaintiffs' interrogatory.

INTERROGATORY NO. 14:

For each organization, association or other entity identified in YOUR Response to Interrogatory No. 13, 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 any committee or subcommittee of which THIS DEFENDANT was a member, and the dates of such committee or subcommittee membership.

RESPONSE TO INTERROGATORY NO. 14:

See Union Carbide's response to Interrogatory No. 13. 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. 17. Union Carbide also has in its possession a

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copy of at least one edition of the newsletter published by the Insulation Industry Hygiene Research Program. In addition, Union Carbide possesses files which may contain miscellaneous correspondence to or from the AIA or other organizations.

INTERROGATORY NO. 15:

Had THIS DEFENDANT prior to 1973 received any DOCUMENTS containing results or conclusions of any studies and/or tests conducted by Bonsib for Standard Oil of New Jersey relating to asbestos exposure in the workplace or the human health consequences of exposure to asbestos? If so:

A. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

B. State the date upon which THIS DEFENDANT first received such DOCUMENTS;

C. State the IDENTITY of the custodian of such DOCUMENTS.

D. This interrogatory does not apply to DOCUMENTS contained in a library maintained by a DEFENDANT hospital or a DEFENDANT's library providing access to the general public.

RESPONSE TO INTERROGATORY NO. 15:

Union Carbide has no presently available record of such correspondence; Union Carbide may have interchanged such information indirectly through its organization affiliations. 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. 16:

Had THIS DEFENDANT prior to 1973 received a copy or any portion of any studies and/or tests conducted by any insurance company, including but not limited to Metropolitan Life Insurance Company and Aetna Insurance relating to asbestos exposure in the workplace or the human health consequences of exposure to asbestos? If so:

A. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

B. State the date upon which THIS DEFENDANT first received such DOCUMENTS;

C. State the IDENTITY of the custodian of such DOCUMENTS.

D. This interrogatory does not apply to DOCUMENTS contained in a library maintained by a DEFENDANT hospital or a DEFENDANT's library providing access to the general public.

RESPONSE TO INTERROGATORY NO. 16:

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

Union Carbide maintains in its Repository of asbestos-related documents and other documentary material. The Repository includes a myriad of documents and other material from Union Carbide's former Calidria business, from other former businesses which manufactured products which contained some asbestos, and from Union Carbide facilities which used and removed asbestos insulation and other asbestos products in accordance with the most advanced state-of-the-art industrial practices. The repository encompasses documents and material generated and received by Union Carbide employees or officials, as well as published articles collected by Carbide employees and officials. Subjects which the documents and material discuss or pertain to include, but are not limited to, the following: Union Carbide's former Calidria business; the unique physical and chemical properties of the Calidria fiber, which engender the fiber's innocuous nature; information about asbestos containing products manufactured by Union Carbide or other producers; and information about other asbestos

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generally, including health officials of the other asbestos. The repository should include any of the material requested by this request to the extent that it remains in Union Carbide's possession. Upon plaintiff's request, Union Carbide will make its Repository, except privileged material, available to plaintiff for review and replication at a suitable time and place.

INTERROGATORY NO. 17:

Had THIS DEFENDANT prior to 1973 received any DOCUMENTS containing results or conclusions of any studies and/or tests conducted by any laboratory, including but not limited to, the Saranac Laboratory relating to asbestos exposure in the workplace or the human health consequences of exposure to asbestos? If so:

A. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

B. State the date upon which THIS DEFENDANT first received such DOCUMENTS;

C. State the IDENTITY of the custodian of such DOCUMENTS.

D. This interrogatory does not apply to DOCUMENTS contained in a library maintained by a DEFENDANT hospital or a DEFENDANT's library providing access to the general public.

RESPONSE TO INTERROGATORY NO. 17:

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 the Trudeau Foundation relating to asbestos exposure in the workplace or the human health consequences of exposure to asbestos. See also Union Carbide's response to Interrogatory No. 16.

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INTERROGATORY NO. 18:

Had THIS DEFENDANT (except for a defendant that is an educational institution) prior to 1973 ever maintained a library (or libraries) which contained books, articles, periodicals, journals, and/or reference materials that related to the subjects of asbestos, industrial hygiene, medicine, safety and/or occupational disease. 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. 18:

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 Chemicals and Plastics Company, Inc., 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 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 Services
P.O. Box 6116
Cleveland, Ohio 44101

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

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

Union Carbide Corporation
Chemical & Plastics Bldg. 740
South Charleston, West Virginia 25303

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Union Carbide Corporation
Tarrytown Technical Center
Library and Tech. Inf. Serv.
Tarrytown, NY 10591

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

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

Union Carbide Corporation
Chemicals & Plastics
Library
Tech. Info. Service
Bldg. 200
Bound Brook, NJ 08805

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

INTERROGATORY NO. 19:

With the exception of OSHA compliance, had THIS DEFENDANT (except for a defendant that is an educational institution) prior to 1980 exchanged DOCUMENTS or communicated with any person or other COMPANY expressly regarding the results of tests and/or studies relating to asbestos exposure in the workplace or the human health consequences of exposure to asbestos? If so, state:

A. Each person 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.

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RESPONSE TO INTERROGATORY NO. 19:

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. 13. Upon plaintiffs' request, Union Carbide will make non-privileged files containing asbestos-related correspondence available to the plaintiffs for review and replication at a suitable time and place. See also Union Carbide's response to Interrogatory No. 16.

INTERROGATORY NO. 20:

Has any employee or designee of THIS DEFENDANT testified as a representative of THIS DEFENDANT 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 relating to asbestos exposure in the workplace or the human health consequences of exposure to asbestos? 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 and, if so, state the IDENTITY of the custodian of such DOCUMENTS.

RESPONSE TO INTERROGATORY NO. 20:

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:

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."

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

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, NJ 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 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.

(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.

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INTERROGATORY NO. 21:

Has THIS DEFENDANT (except for a defendant that is an educational institution) conducted, or caused to be conducted, tests, and/or studies of ambient asbestos dust created during the manufacture, processing and/or assembling for sale of ASBESTOS-CONTAINING PRODUCTS? If so, state:

A. Each manufacturing facility, including location and address, at which any 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 such DOCUMENTS.

RESPONSE TO INTERROGATORY NO. 21:

Union Carbide's Calidria asbestos was not an asbestos-containing product. Rather it was a unique short-fiber chrysotile asbestos mined by Union Carbide and sold in fibrous and pelletized forms to producers and manufacturers for use in their products and production processes.

Two studies of Calidria asbestos were made by the Chemical Hygiene Fellowship of Mellon Institute on behalf of Union Carbide:

1. The first study was entitled "The Fibrogenic Potential of Asbestos Products - Via Intraperitoneal Injection In Guinea Pigs, Rats and Rabbits and by the Intratracheal Route in the Rat". Although Union Carbide cannot represent that it knows the names of the persons who conducted the study, the following individuals did sign the study: Edwin R. Kinkhead, B.S., Research Assistant, Urbano C. Pozzani, M.S., Senior Fellow and Charles P. Carpenter, Ph.D., Assistant Administrative Fellow. Also, the following persons received an acknowledgment in the study:

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Charles C. Hahn, B.S., Junior Fellow and John M. King, Ph.D., DVM, Fellow. The study was completed on July 8, 1966. The purpose of the study was to evaluate the degree of fibrogenicity of asbestos mined at Union Carbide's King City, California facility as compared with other forms of asbestos. A copy of the study's report will be supplied if requested.

2. The second study was entitled "Calidria Asbestos Resin Grade RG244, Tracheal Insufflation of Rat Lungs with Interpretation of Pathology After 20, 60, 90, and 180 Days". Although Union Carbide cannot represent that it knows the names of the persons who conducted the study, Charles P. Carpenter, Ph.D., Administrative Fellow, was the editor of the study's report. In addition, the following individuals were named as contributors to the study: D.L. Geary, Jr., E.R. Kinkhead, R.C. Myers and D.J. Nachreiner. The study was completed on September 3, 1971. The purpose of the study was to evaluate the degree of fibrogenicity of Union Carbide's RG244 as compared with other forms of asbestos. A copy of the study's report will be supplied if requested.

In addition to the above two tests, and in addition to chemical analyses of Calidria which Union Carbide may have undertaken, in the mid-1960's Union Carbide cooperated with the Pneumoconiosis Research Unit of the Llandough Hospital in the United Kingdom to conduct a "trace element analysis" of asbestos and provided samples of Calidria asbestos for such analysis. Union Carbide may also have conducted "patch tests" to determine the impact, if any, of Calidria on skin and other soft tissue. Union Carbide is currently endeavoring to locate reports of these tests.

Union Carbide conducted dust studies at various facilities of Calidria customers and these studies, upon plaintiffs' request, will be made available to the plaintiffs for review and duplication at a suitable time and place.

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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 the 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 of production processes). Dr. Harry Rhodes, an industrial hygienist, supervised Union Carbide's dust monitoring program. Union Carbide's custodian of records is Mrs. Virginia Ruszczyk, Kelley, Drye & Warren LLP, 101 Park Avenue, New York, New York 10178.

INTERROGATORY NO. 22:

Has THIS DEFENDANT (except for a defendant that is an educational institution) conducted, or caused to be conducted, any tests and/or studies on ambient asbestos dust levels at any location or job site where ASBESTOS-CONTAINING PRODUCTS were installed, utilized or removed? If so, for the first 5 tests and/or studies, state:

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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. 22:

Union Carbide's Calidria asbestos was not an asbestos-containing product. Rather it was a unique short-fiber chrysotile asbestos sold in fibrous and pelletized forms to producers and manufacturers for use in their products and production processes.

See Union Carbide's response to Interrogatory No. 21. Upon plaintiffs' request, Union Carbide will make copies of results of such dust counts available to the plaintiffs for review and duplication at a suitable time and place.

INTERROGATORY NO. 23:

Did THIS DEFENDANT (except for a defendant that is an educational institution) have any laboratory or other similar type of facility anywhere in the United States at which it conducted, or caused to be conducted, any tests and/or studies of ASBESTOS-CONTAINING PRODUCTS or RAW ASBESTOS relating to the health consequences of asbestos or the dust generated by any use of asbestos or ASBESTOS-CONTAINING PRODUCTS. If so, state:

A. The location, including name and address, at which each 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.

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RESPONSE TO INTERROGATORY NO. 23:

Union Carbide's Calidria asbestos was not an asbestos-containing product. Rather it was a unique short-fiber chrysotile asbestos sold in fibrous and pelletized forms to producers and manufacturers for use in their products and production processes.

See Union Carbide's responses to Interrogatories No. 21 and No. 22.

INTERROGATORY NO. 24:

Has THIS DEFENDANT made available to its employees a medical examination program to determine the absence or presence of asbestos-related disease? If so, state:

A. Whether chest x-rays or pulmonary function tests were part of such program(s);

B. Whether participation in any such program was a mandatory condition of employment or was voluntary;

C. Whether THIS DEFENDANT has DOCUMENTS of such program(s);

D. The IDENTITY of the custodian of such DOCUMENTS.

RESPONSE TO INTERROGATORY NO. 24:

See Union Carbide's Preliminary Statement. Subject to its Preliminary Statement, Union Carbide responds as follows:

Union Carbide Corporation has had a long-standing practice of requiring medical examinations for employees, including chest X-rays, and surveillance for asbestos-related disease, as appropriate to particular employee positions or jobs and as subject to applicable collective bargaining agreements and the laws of relevant jurisdictions. The current extensive program evolved over the history of Union Carbide. See Union Carbide's response to Interrogatory No. 46, below.

Union Carbide's Medical Department was formally organized in 1939. 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:

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(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 [1985-1989]

(6) Jean B. Case [989-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.

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

Union Carbide owned and operated the mine and mill for its Calidria asbestos, located in or near King City, California, from 1963 to 1985. No employee has ever filed a worker compensation claim for an asbestos-related disease. Throughout the period of the mine and mill's operation, Union Carbide maintained a program of required, regular medical check-ups, including pulmonary X-rays, which included exams for asbestos-related disease. There has never been any detection of asbestos-related disease among employees or former employees at the Calidria mine and mill. Dr. Duane Hyde, now retired, a former physician in private practice in King City, California, was retained by Union Carbide to provide medical care to Union Carbide's employees. Dr. Hyde is familiar and can verify the lack of incidence of asbestos-related disease among Calidria employees. Moreover, the death certificates of former Calidria employees, which Union Carbide or its successor have reviewed, also record no asbestos-related

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disease as a cause of death (one former Calidria employee had an unidentified lung disease; two employees at a Union Carbide research laboratory in Niagara Falls, New York, which conducted work with Calidria as well as with other materials, developed asbestos-related diseases).

Memoranda and other documents relating to the establishment, implementation, and review of Union Carbide's medical examination programs may presently be maintained within Union Carbide's central repository for asbestos-related documents and in record storage locations at Union Carbide's various facilities. The Custodian of documents for our repository is Virginia Ruszczyk, Kelley Drye & Warren, L.L.P., 101 Park Avenue, New York, New York 10178.

Upon plaintiff's request, Union Carbide will make its repository available to plaintiffs for review and replication at a suitable time and place. In addition, results of individual medical exams not in the custody of Union Carbide's counsel are maintained by the facilities where the individuals worked at another document repository in Vermont. Ed Debors is the custodian for that repository. Union Carbide will make individual results available to the plaintiffs only upon receipt of a request and waiver of confidentiality from the individual or their next-of-kin.

INTERROGATORY NO. 25:

Prior to 1973, did any person file a Workers' Compensation claim for asbestos-related injury against THIS DEFENDANT or against any Workers' Compensation insurance carrier which provided coverage for THIS DEFENDANT? If so, state the total number of such claims and, for the first 20 such claims state:

A. The date of such claim;

B. The name of the claimant;

C. The case number;

D. The court in which the claim was filed;

E. The IDENTITY of THIS DEFENDANT's custodian of DOCUMENTS evidencing such claims.

RESPONSE TO INTERROGATORY NO. 25:

No employee or worker at Union Carbide's former Calidria mine or mill at King City, California has ever filed a worker's compensation claim for asbestos-related disease. (One former

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employee reported a lung disease of unknown origin and two reports were received from employees at a New York pilot plant which did work with Calidria as well as other materials.) Indeed, no one at the mine and mill ever reported any incidence of asbestos-related disease. Dr. Duane Hyde, now retired, an independent physician formerly engaged by Union Carbide to provide medical exams and care to employees and workers at the Calidria mine and mill, is familiar with the lack of incidence of asbestos-related disease or injury among that population. Dr. Hyde still resides in the King City area.

Calidria was mined from a deposit which consisted of a unique form of chrysotile. As a result of its unique properties, Calidria could not pose the dangers which might be created by asbestos from other deposits. Those properties include the following: Calidria's short fiber length (shorter than any other known chrysotile); The Calidria deposit's lack of tremolite contamination; Calidria's quick dissolution due to the "weak" fibril structure; and its width and shape. Many of Union Carbide's expert witnesses can testify as to the unique properties of the Calidria fiber and resulting innocuous biological impact of Calidria. Additionally, Union Carbide possesses many documents in its repository pertaining to those issues. Upon Plaintiffs' request, Union Carbide will make its repository available for review and replication at a suitable time and place.

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

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.

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The health and safety literature made available and disseminated by Union Carbide to its Calidria customers warned of possible serious adverse health effects associated with the excessive inhalation of asbestos fiber, advised customers on ways to control or avoid such hazards, including the use of respirators as a way to avoid the hazards. In addition to the dissemination of health and safety information, Union Carbide took active steps to help insure that Calidria was handled and used in a clean and safe manner and environment: Union Carbide employed shrink-wrap, tight-fitting packaging to prevent leakage, spillage, or dust emission during the shipment of Calidria. Union Carbide also developed pelletized forms of Calidria which would reduce dust emission. In 1972, Union Carbide offered to take dust counts of the premises of Calidria customers in order to help them maintain a safe working environment, a service which many Calidria customers utilized (Calidria was not sold to the general public or other "end-users", but rather was marketed only to manufacturers or producers who used Calidria in their products or production processes). Dr. Harrison Rhodes, an industrial hygienist, supervised Union Carbide's dust monitoring program.

Union Carbide owned and operated its Calidria mine from 1963 to 1985. During that time, Union Carbide employed many employees at the Calidria mine and mill sites at or near King City, (including office workers). No employee has ever filed a worker compensation claim for an asbestos-related disease. Union Carbide maintained a program of regular medical check-ups, including pulmonary X-ray, which included exams for asbestos-related disease. There has never been a report of any asbestos-related disease among employees or former employees at the King City site. Dr. Duane Hyde, now retired, a former physician is private practice in King City, California, was retained by Union Carbide to provide medical examinations to Union Carbide's employees, is familiar and can verify the lack of incidence of asbestos-related disease among Calidria employees. Moreover, the death certificates of former Calidria employees, which Union Carbide or its successor have reviewed, also record no asbestos-related disease as a cause of death (one former Calidria employee had an unidentified lung disease; two employees at a Union Carbide research laboratory in Niagara Falls, NY which did work with Calidria as well as other materials, developed asbestos-related diseases).

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INTERROGATORY NO. 26:

Does THIS DEFENDANT have insurance available to cover judgment(s) entered against it in asbestos-related personal injury lawsuits? If so, 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 amount(s) of coverage of each policy;

D. The applicable dates of coverage.

RESPONSE TO INTERROGATORY NO. 26:

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

INTERROGATORY NO. 27:

State whether YOU have controlled, purchased, or in any way acquired any controlling interest in any corporation or business entity which has mined, manufactured, produced, processed, compounded, sold, supplied, distributed and/or otherwise placed RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS in the stream of commerce. If so, state:

A. The name and address of said corporation or business entity;

B. The dates YOU controlled, purchased or acquired any interest; and

C. The nature of the business as it pertains to asbestos.

RESPONSE TO INTERROGATORY NO. 27:

Union Carbide's Calidria asbestos was not an asbestos-containing product. Rather it was a unique short-fiber chrysotile asbestos sold in fibrous and pelletized forms to producers and manufacturers for use in their products and production processes.

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

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tree sprout inhibitor) prior to Union Carbide's acquisition of the company. Other companies, in particular the Magnolia Welding Supply Company, Inc. and Gas Technics Gases & Equipment Centers of Eastern Pennsylvania, Inc., acquired by Union Carbide may also have sold asbestos products.

No employee or worker at Union Carbide's former Calidria mine or mill at King City, California has ever reported an incidence of asbestos-related disease (this includes a lack of worker compensation filings and reports on death certificates). (One former employee reported a lung disease of unknown origin.) Dr. Duane Hyde, now retired, an independent physician formerly engaged by Union Carbide to provide medical exams and care to employees and workers at the Calidria mine and mill, is familiar with the lack of incidence of asbestos-related disease or injury among that population. Dr. Hyde still resides in the King City area.

INTERROGATORY NO. 28:

State whether THIS DEFENDANT, between 1930 and 1985, has ever engaged in the following activities with regard to RAW ASBESTOS, and if so, state the inclusive dates of such activity:

A. Mining;

B. Milling;

C. Supply;

D. Importing;

E. Processing;

F. Distribution;

G. Marketing;

H. Sale;

I. Brokering.

RESPONSE TO INTERROGATORY NO. 28:

To the best of Union Carbide's understanding of this interrogatory, and based upon its present knowledge, Union Carbide responds as follows:

A. Yes; 1963-1985

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entity, shipyard, distributor, refinery, contractor, supplier, manufacturer, PREMISE owner or occupant, ship owner, or other PREMISE or site in the GEOGRAPHIC AREA. If so, state:

1. The names of each such COMPANY, governmental agency or entity, shipyard, distributor, supplier, manufacturer, refinery, contractor, PREMISE owner or occupant, ship, owner, PREMISE or site;

2. The inclusive dates of each such sale, shipment, distribution, use or installation and the amount (volume) and the trade or brand name of each such ASBESTOS--CONTAINING PRODUCT sold;

3. Whether you have any records indicating any such sale, shipment, distribution, use or installation and, if so, the name, address and job classification of each person who currently has possession of such records.

J. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

RESPONSE TO INTERROGATORY NO. 31:

Union Carbide's Calidria asbestos was not an asbestos-containing product. Rather it was a unique short-fiber chrysotile asbestos sold in fibrous and pelletized forms to producers and manufacturers for use in their products and production processes.

See Union Carbide's response to Interrogatory #30, above.

INTERROGATORY NO. 32: (PREMISES DEFENDANTS only):

Did YOU install, remove, or handle or contract to have others install, remove, or handle RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS at any PREMISES in the GEOGRAPHIC AREA which PREMISES is at issue as to YOU in San Francisco Superior Court asbestos litigation as of the date of your answers to these interrogatories? If so:

A. IDENTIFY the PREMISES.

B. For each of the PREMISES:

1. State the nature of your ownership or possessory interest;

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B. Yes; 1963-1985

C. Yes; 1963-1985

D. No.

E. Yes; 1963-1985

F. Yes; 1963-1985

G. Yes; 1963-1985

H. Yes; 1963-1985

I. No.

INTERROGATORY NO. 29:

If YOUR answer to any of subparts of Interrogatory 28 regarding RAW ASBESTOS is in the affirmative, state:

A. The trade, brand name, and/or generic name of such RAW ASBESTOS milled or MARKETED in any form or quantity between 1930 and 1985;

B. The date(s) such RAW ASBESTOS was first placed on the market, including the date(s) such RAW ASBESTOS was first marketed;

1. On an experimental basis;

2. On a test basis;

3. For sale.

C. The date(s) such RAW ASBESTOS:

1. Ceased to be produced; or

2. Was recalled from the market, if ever.

D. A description of the chemical composition of such RAW ASBESTOS, including the type and/or grade of asbestos;

E. A description of the physical appearance and nature of such RAW ASBESTOS, including any color coding, distinctive marking and/or logo on the packaging or container;

F. A detailed description of the intended use of such RAW ASBESTOS, including any temperature limits for each such use;

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G. Whether such RAW ASBESTOS was on the U.S. Government's "Qualified Products List," and if so, the inclusive dates it was on such list;

H. IDENTIFY to whom such RAW ASBESTOS has, at any time, been sold. As to each such, state:

I. Whether any of THIS DEFENDANT's RAW ASBESTOS has, at any time, been sold, shipped, or otherwise distributed, used or installed to or at any COMPANY (including power company or utility), governmental agency or entity, shipyard, distributor, refinery, contractor, supplier, PREMISE owner or occupant, ship owner, or other PREMISE or site in the GEOGRAPHIC AREA and whether any of THIS DEFENDANT's RAW ASBESTOS has at any time, been sold to any manufacturer, or manufacturing facility, of ASBESTOS-CONTAINING PRODUCTS. If so, state:

1. The names of each such COMPANY, governmental agency or entity, shipyard, distributor, supplier, manufacturer or refinery;

2. The inclusive dates of each such sale, and the amount (quantity) and the trade brand name of such RAW ASBESTOS sold;

3. The manner of shipment (e.g. boat, rail, etc.)

4. Whether you have any records indicating any such sale or shipment and, if so, the name, address and job classification of each person who currently has possession of such records.

5. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

RESPONSE TO INTERROGATORY NO. 29:

Union Carbide's Calidria asbestos was not an asbestos-containing product. Rather it was a unique short-fiber chrysotile asbestos mined by Union Carbide and sold in fibrous and pelletized forms to producers and manufacturers for use in their products and production processes.

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Union Carbide sold its asbestos initially as Union Carbide Asbestos and then under the name "Calidria". Union Carbide, however, packaged Calidria asbestos for the Montello Corporation for sale under the trade names 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.

A. Calidria

B. 1963, for sale.

C. Union Carbide sold it's Calidria asbestos business to KCAC Corporation on June 30, 1985.

D. Calidria, a chrysotile asbestos, is marketed as new asbestos in fibrous and pellet forms. The chemical composition of basic Calidria asbestos is

$Mg_6 (OH)_8 Si_4 0_{10}$. Various treated forms of Calidria are also sold, and these may have additional chemical components.

E. Pellets or fine white powder.

F. Calidria asbestos is marketed through non-exclusive distributors to manufacturers who in their manufacturing have a need for asbestos having the qualities of Calidria for use as a filler, reinforcer, opacifier, thixotroper to thickener. Union Carbide is informed and believes that Calidria cannot be used for purposes other than as stated above primarily due to its quality and composition, in particular the naturally-occurring short length of its fibers. Specifically, Calidria asbestos is not suitable for, nor intended for, asbestos cement, insulation, friction products, or textile products.

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

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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 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

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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 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.

G. No.

H. 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.

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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. Sales records reviewed by Union Carbide to date indicate that the following sales were made to companies within the "defined geographic area":

Kaiser Gypsum, Antioch, from 1970 through 1976;

Rich-Tex Corporation, Richmond, from 1970 through 1977; and

Fibreboard Corporation, Martinez, in 1972 (40 lb. only)

Since 1968, Union Carbide sold Calidria to distributors, who in turn sold to users, in the "defined geographic area." These distributors included Harrison & Crossfield (Pacific), Inc., from 1968 to 1985, and Van Waters & Rogers, in 1970 and 1971. Through these distributors, sales to other companies in the "defined geographic area" have also been made. Records reviewed by Union Carbide to date indicate that such sales were made, in 1984, to the following companies:

Adhesive Engineering

Asphalt Products Oil Corp.

Hyso 1-Dexter

Intercoastal Co.

Mica-Kote

Pronto Plastics

Royell, Inc.

Seal Tuff Paint Co.

Terralite

Union City Ind.

Hexcel Corp.

Further records reflecting sales in the "defined geographic area" for other years since 1968 may be in the possession of Harrison & Crossfield (Pacific), Inc., Emeryville, CA.

I. See Response to H above.

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INTERROGATORY NO. 30:

Between 1930 and 1985, did YOU ever engage in any of the activities listed below with regard to ASBESTOS-CONTAINING PRODUCTS? If so, state the inclusive dates of such activity:

A. Supply;

B. Importing;

C. Distribution;

D. Marketing;

E. Sale;

F. Labeling;

G. Manufacturing;

H. Brokering.

RESPONSE TO INTERROGATORY NO. 30:

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.

Prior to 1976, Union Carbide manufactured Bakelite phenolics, which were molding compound resins. Bakelite phenolics were marketed by Union Carbide for use by manufacturers primarily to mold electronic parts and products such as switches, switch boxes, radios, and plug in receptacles. Most Bakelite phenolics did not contain asbestos. Bakelite was used in part, because it provides electrical insulation. The asbestos fiber in those Bakelite brands which contained it was fully encapsulated or mixed within or with other material.

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

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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 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. See Union Carbide's response to Interrogatory #29.

INTERROGATORY NO. 31:

If your answer to any subpart of Interrogatory No. 31 [sic] regarding "ASBESTOS - CONTAINING PRODUCTS" is in the affirmative, state:

A. The trade, brand name, and/or generic name of each such ASBESTOS-CONTAINING PRODUCT MARKETED in any form or quantity between 1930 and 1985;

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B. The date(s) each such ASBESTOS-CONTAINING PRODUCT was first placed on the market, including the date(s) each such ASBESTOS-CONTAINING PRODUCT was first MARKETED;

1. On an experimental basis;

2. On a test basis; or

3. For sale.

C. The date(s) each such ASBESTOS-CONTAINING PRODUCT:

1. Ceased to be produced; or

2. Was recalled from the market, if ever.

D. A detailed description of the chemical composition of each such ASBESTOS-CONTAINING PRODUCT, including the type and/or grade of asbestos and/or asbestos fiber contained in each such product and the quantitative percentage of asbestos or asbestos fiber such product, and all non-asbestos components of the ASBESTOS-CONTAINING PRODUCT, and if the chemical composition changed over time, the inclusive dates of each formulation;

E. A description of the physical appearance and nature of each such ASBESTOS-CONTAINING PRODUCT, including any color coding, distinctive marking and/or logo, either on the product or on the packaging;

F. A detailed description of the intended use of each such ASBESTOS-CONTAINING PRODUCT, including any temperature limits for each such use;

G. Whether any such ASBESTOS-CONTAINING PRODUCT was on the U.S. Government's "Qualified Products List," and if so, the inclusive dates it was on such list;

H. The name and address of the supplier of the RAW ASBESTOS used in each such product and the time period of such supply;

I. Whether any of THIS DEFENDANT's RAW ASBESTOS OR ASBESTOS-CONTAINING PRODUCTS have, at any time, been sold, shipped, or otherwise distributed to any COMPANY (including power company or utility), governmental agency or

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2. State the inclusive date of that interest;

3. IDENTIFY the party from whom that interest was acquired;

4. IDENTIFY the party, if any, to whom that interest was transferred.

C. IDENTIFY every contract to which YOU were a party or of which you have knowledge wherein the performance of such contract involved the installation, removal, disturbing or handling of any RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS at YOUR PREMISES. For each such contract:

1. IDENTIFY the parties to the contract;

2. Provide a general description and specific location of the work to be performed by each party to the contract;

3. IDENTIFY and describe the NATURE of the RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS installed, removed, disturbed or handled in the performance of the contract;

4. State the dates of the contract and the dates of performance;

D. Except as provided in response to subpart (c), has any work other than routine maintenance been done on or to the PREMISES that involved the installation, removal, disturbing or handling of RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS? If so, for each instance:

1. State the inclusive dates of the work;

2. Provide a general description and specific location of the work;

3. State whether the work was done by YOU and/or YOUR employees;

4. IDENTIFY and describe the NATURE of the RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS installed, removed, handled or disturbed;

5. IDENTIFY from whom the RAW ASBESTOS OR ASBESTOS-CONTAINING PRODUCTS were acquired.

E. Has any asbestos abatement effort been made at the PREMISES? If so, for each such effort:

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1. IDENTIFY who did the work;

2. State the inclusive dates thereof;

3. State whether samples were taken, and, if the samples still exist, IDENTIFY the custodian of the samples;

4. State whether any material was tested, and, if so, what were the result of each test;

5. IDENTIFY each test result with sufficient particularity for purposes of request for production of documents, or, in the alternative, attach a copy to YOUR answers to these interrogatories.

F. Except for insurance coverage litigation, have you filed suit against, or otherwise sought to recover from, any person or entity for some or all of the cost of asbestos abatement or for the property damage allegedly caused by the presence of RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS on the PREMISES identified in response to subpart (A) above? If so:

1. IDENTIFY the person or entity against whom YOU have filed suit or otherwise sought to recover;

2. If YOU have filed suit, state the court in which the action was filed, the date on which it was filed, IDENTIFY all Plaintiffs and Defendants and their counsel of record;

3. State whether or not the case has been resolved, and, if so, what was the status of disposition.

G. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

H. IDENTIFY the person(s) presently most knowledgeable about the information sought in this interrogatory or its subparts.

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RESPONSE TO INTERROGATORY NO. 32:

Not applicable.

INTERROGATORY NO. 33: (CONTRACTOR DEFENDANTS only):

At any time between 1930 and 1985, did YOU hold a contractor's license in the State of California? If so:

A. IDENTIFY each license by type, date and number.

B. If on the date of your answers YOU are a defendant in four or more asbestos actions in San Francisco Superior Court, IDENTIFY each job or contract that YOU performed (directly or through one or more subcontractors) during this time period for work in any PREMISES which is at issue as to YOU on such date, and in any PREMISES of 50,000 square feet or more in the GEOGRAPHIC AREA which job or contract involved installation, removal, disturbing or handling RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS. (Alternatively, at your option, you may IDENTIFY each job or contract YOU performed (directly or through one or more subcontractors) during this time frame for all work, or for all work on PREMISES of 50,000 square feet or more, in the GEOGRAPHIC AREA.) As to each such job or contract:

1. IDENTIFY the location (including name of ship, if applicable) the job or work was performed;

2. State the date of the contract or the inclusive dates of the work;

3. IDENTIFY the person or entity with whom you contracted;

4. State your job or contract number.

C. If on the date of your answers you are not a defendant in four or more asbestos actions in San Francisco Superior Court, IDENTIFY each job or contract that YOU performed (directly or through one or more subcontractors) during this time period for work in any PREMISES which is at issue as to YOU on such date. As to each such job or contract:

1. IDENTIFY the location (including name of ship, if applicable) the job or work was performed;

2. State the date of the contract or the inclusive dates of the work;

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3. IDENTIFY the person or entity with whom you contracted;

4. State your job or contract number.

RESPONSE TO INTERROGATORY NO. 33:

Not applicable.

INTERROGATORY NO. 34:

Did any of the distributors identified in your Answer to Interrogatory Nos. 29 and 31 have an exclusive distributorship? If so, state the relevant time period.

RESPONSE TO INTERROGATORY NO. 34:

No, according to the best information presently available to Union Carbide.

Approximately three-quarters of Calidria sales were made directly by Union Carbide. Distributors accounted for the remaining approximate 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
3) Bouffard Associates
4) A.T. Callas Company
5) D. & F. Distributing, Inc.
6) Harrisons & Crosfield (Canada)
7) Harrisons & Crosfield (Pacific)
8) Lenape Chemicals, Inc.
9) Technical Petroleum Company
10) Technical Products, Inc.
11) Montello, Inc.
12) Harwick Chemical Corp.
13) Plastex, Inc.

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14) Union Carbide International

15) Western Chemical & Manufacturing Company

16) McKesson 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 Permutit Co., Inc.

23) Van Waters and Rogers

24) Ambrosia Industrial, Inc.

25) Southern Fiberglas Supply

INTERROGATORY NO. 35:

If THIS DEFENDANT entered into any agreements for the rebranding of any ASBESTOS-CONTAINING PRODUCTS by THIS DEFENDANT for resale or distribution by another person or entity, describe each agreement's terms and the parties to said agreement, the duration of the agreement, and name of each product(s) and/or material(s) covered by each such agreement.

RESPONSE TO INTERROGATORY NO. 35:

Union Carbide entered into no such agreement. See Union Carbide's response to Interrogatory #20.

INTERROGATORY NO. 36:

If THIS DEFENDANT entered into any agreements for the rebranding of ASBESTOS--CONTAINING PRODUCTS manufactured, sold, supplied or distributed by another person or entity for resale or distribution by YOU, describe each of the agreements and the parties to said agreement, the terms, the duration, and the names of each product(s) and/or material(s) covered by each such agreement.

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RESPONSE TO INTERROGATORY NO. 36:

See Union Cabide's response to Interrogatory #35, including all objections set forth therein.

INTERROGATORY NO. 37:

As to RAW ASBESTOS and to each such ASBESTOS-CONTAINING PRODUCT listed in YOUR responses to Interrogatories Nos. 29 and 31 did DEFENDANT warn of the health hazards of asbestos? If so, state for each such warning:

A. The content, size, color, and location; whether the warning appeared on the material and/or on the container, and/or was placed on a tag; whether the warning was included in contracts; whether the warning was included in advertising or other promotional materials.

B. State whether you have any photographs thereof;

C. The inclusive dates on which you used each such warning;

D. State all changes you made in such warnings and the dates of such changes; and

E. Identify the person most knowledgeable about your warnings and warning policy.

RESPONSE TO INTERROGATORY NO. 37:

Union Carbide's Calidria asbestos was not an asbestos-containing product. Rather it was a unique short-fiber chrysotile asbestos sold in fibrous and pelletized forms to producers and manufacturers for use in their products and production processes.

A - D) Calidria could not cause harm associated with other asbestos. See Union Carbide's response to Interrogatory #25. Nevertheless, Union Carbide still took steps to prevent or minimize exposure to Calidria dust. Calidria was packaged in brown Kraft paper bags which were individually shrink-wrapped in plastic, placed on pallets and the entire pallet of bags was, in turn, shrink- wrapped in plastic. From 1975 to 1985, the shrink-wrapped pallets of CALIDRIA pellets and fiber wholly contained within the double shrink-wrapped bags were placed in air-tight metal containers which were, in turn, sealed.

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Union Carbide printed two cautionary statements on its CALIDRIA packaging. The first cautionary statement was first used in June of 1968 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 that year. This cautionary statement read as follows:

"Caution. Contains asbestos fibers, Avoid creating dust. Breathing asbestos dust may cause serious bodily harm."

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 1972, Union Carbide offered to take dust counts of the premises of Calidria customers in order to help them maintain a safe working environment, a service which many Calidria customers utilized (Calidria was not sold to the general public or other "end-users", but rather was marketed only to manufacturers or producers who used Calidria in their products or production processes). Dr. Harrison Rhodes, an industrial hygienist, supervised Union Carbide's dust monitoring program.

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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.

See also Union Carbide's response to Interrogatory #41.

(E) John Myers has been involved in various aspects of Union Carbide Corporation's Calidria asbestos business since 1966, and has familiarity with many facets of the business and of the Calidria product. From 1970-1981, Mr. Myers held the Metals Division position of Marketing Manager-[for] asbestos. From 1981 until June 30, 1985, he served in the Metals Division as Product and Production Manager-[for] asbestos. John Myers is no longer employed by Union Carbide.

INTERROGATORY NO. 38:

With respect to each of YOUR ASBESTOS-CONTAINING PRODUCTS, state whether THIS DEFENDANT's name, a trademark, logos, color coding, or other identifying markings ever appeared on the actual product itself. If so, IDENTIFY each such product, state when the practice to place such identifying markings upon the product was begun and when it ended, if applicable, and describe in detail the pertinent marking(s) and the purpose, if any, of such markings.

RESPONSE TO INTERROGATORY NO. 38:

Union Carbide's Calidria asbestos was not an asbestos-containing product. Rather it was a unique short-fiber chrysotile asbestos sold in fibrous and pelletized forms to producers and manufacturers for use in their products and production processes.

Union Carbide formerly mined CALIDRIA chrysotile asbestos and generally sold the asbestos in a pelletized form and occasionally in a white powder form. There was no Union Carbide trademark or any other trademark or writing placed on the "actual product itself' (i.e. the pellets or the powder). See Union Carbide's response to Interrogatory #29.

INTERROGATORY NO. 39:

Between the years 1930 to 1985, did THIS DEFENDANT purchase or otherwise acquire ASBESTOS-CONTAINING PRODUCT lines from another person or entity? If so, state for each such purchase:

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A. Date of purchase or acquisition;

B. Terms of purchase or acquisition agreement;

C. Either (1) attach all DOCUMENTS evidencing said acquisition, or (2) attach disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

D. Trade, brand, and/or generic name of each such product line so acquired;

E. Name of the person or entity from whom YOU purchased or acquired each such ASBESTOS-CONTAINING PRODUCT line; and

F. Location of any manufacturing facilities so acquired, and the type of ASBESTOS-CONTAINING PRODUCTS manufactured therein.

RESPONSE TO INTERROGATORY NO. 39:

See Response to Interrogatory No. 27.

INTERROGATORY NO. 40:

Between the years 1930 to 1985, did THIS DEFENDANT sell any ASBESTOS-CONTAINING PRODUCT line to another person or entity? If so, state for each such sale:

A. Date of sale;

B. Terms of sales agreement;.

C. Either (1) attach all DOCUMENTS evidencing said sale, or (2) attach disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

D. Trade, brand, and/or generic name of each such product line sold;

E. Name of person or entity to whom you sold each such ASBESTOS-CONTAINING PRODUCTS line; and

F. Location of any manufacturing facilities so sold, and the type of ASBESTOS-CONTAINING PRODUCTS manufactured therein.

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RESPONSE TO INTERROGATORY NO. 40:

Union Carbide's Calidria asbestos was not an asbestos-containing product. Rather it was a unique short-fiber chrysotile asbestos sold in fibrous and pelletized forms to producers and manufacturers for use in their products and production processes.

See Union Carbide's response to Interrogatory #29. In 1985, Union Carbide sold its Calidria business to KCAC, Inc.

INTERROGATORY NO. 41:

IDENTIFY all brochures, pamphlets, catalogs or other advertising relating to ASBESTOS-CONTAINING PRODUCTS and/or RAW ASBESTOS which THIS DEFENDANT manufactured, sold, distributed or supplied from the year 1930 to 1985. For each such document, state:

A. A description of the document;

B. The year it was printed;

C. The period of time in which it was used;

D. The purpose of such document;

E. Whether the documents or copies of said documents presently exist;

F. I said documents or copies still exist, where they are located; and

G. The IDENTITY of the custodian of such documents.

RESPONSE TO INTERROGATORY NO. 41:

Union Carbide's Calidria asbestos was not an asbestos-containing product. Rather it was a unique short-fiber chrysotile asbestos sold in fibrous and pelletized forms to producers and manufacturers for use in their products and production processes.

(A) - (D) Set forth below is an itemized listing of brochures and materials which Union Carbide made available to its customers, potential customers, and distributors from time to time regarding CALIDRIA asbestos. These materials, which were designed to impart information about the nature, use, and handling of the various CALIDRIA forms, may no longer be in use in some cases and copies thereof may no longer be in Union Carbide's possession, custody, or control.

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I. GENERAL

A. - "Calidria" Booklet.

B. - Asbestos Fibers - REB.

C. - Business Reply Card.

D. - Rubber Booklet.

E. - Grinding Asbestos Pellets.

F. - FDA Status-Asbestos in Paper.

G. - New Additives Induce Thixotropy - Reprint of JLM.

H. - New Idria Chrysotile An Unusual Ore Yields New Products - RGW.

I. - Cationic Asbestos for Waste Water.

J. - Asbestos Products for Oil Pollution Control.

K. - Zeta Potentials of Some Minerals.

L. - US Patent Office RGW - Waste and Water Treatments.

M. - Mineralogy of the Coalinga Asbestos Deposit - FAM & CST.

N. - Bulk Handling Demonstration.

O. - Electron Micrograph Illustrations.

P. - Asbestos Magazine Reprint - JLM - 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. RESIN GRADE PRODUCTS

A. - General

1. "Calidria" RG-144 & RG-244.

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2. Use of Cowles Dissolver.

3. "Calidria" RG Products for Vinyl Plastisol Sealant Applications.

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

5. "Calidria" RG-144 & RG244 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 - RG-144 (Price Schedule)

1. RG-144 Brochure.

2. RG-144 Performance Data.

3. RG-144 Product Characteristics.

4. RG Asbestos Improves Thixotropic 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.

2. RG-244 Comparative Performance Characteristics.

3. RG-244 Product Characteristics & Specifications.

4. Ultrasonic Dispersion of RG-244.

5. RG-244 as a Thixotrope for Polyester Resins.

6. Polyester Putty & Patching Compounds.

7. "Epoxy Coal Tar Coatings."

8. "Chlorinated Rubber Roofing Compound."

9. High Build Vinyl Maintenance Paints.

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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 Brochure

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

2. RG-600 Inquiry Form.

3. Coupled Chrysotile Asbestos Reinforced Thermoplastics (Ancker).

4. RG-600 Request Form.

5. RG-600 Patent Literature - 3,938,278 December 23, 1975.

6. RG-600 Health Brochure.

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

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.

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 (1/2) the Amount of Asbestos.

3. Flintkote Report.

C - SG-1130 (Price Schedule)

D - SG-200/SG200X (Price Schedule)

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

F - SG-210 (Price Schedule)

1. "Calidria" Asbestos SG-210 for Dry Mix Tape Joint Compounds.

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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).

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.

4. How High Purity Asbestos is used for Pitch Control in Papermaking.

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

6. "Calidria" Asbestos for Paper Coatings.

B - High Purity Open (Price Schedule for HPO & HPP)

1. Typical Product Characteristics for HPO.

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

3. Addition Rates for HPO in Primary Water Treatment.

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

C - High Purity Pellets

1. Typical Product Characteristics for HPP.

V. TITANATED PRODUCTS

A - T-135 (Price Schedule)

1. T-135 Opacifying Agent.

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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 - OG-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 Risins, Plastisols, Epoxies, Phenolic Adhesives Organosols" - 9/70.

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

3. "CALIDRIA Asbestos Resin-Grade - 144 and Resin-Grade 244."

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

5. "CALIDRIA Asbestos, a Unique and Versatile Fiber with Proven Applications as an Extender, Thickener, Reinforcer, Opacifier" - 5/74.

6. "New Additives Induce Thixotropy, 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 Corporation, published March, 1972 in Modern Plastics Encyclopedia, McGraw-Hill, Inc.

VIII. HEALTH AND SAFETY

A - General

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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.

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 Systems 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.

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

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

Union Carbide no longer maintains records regarding the advertisements it may have placed promoting CALIDRIA asbestos prior to 1966. Therefore, Union Carbide has answered this interrogatory insofar as it has records.

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Union Carbide has advertised CALIDRIA asbestos and its applications in several trade journals. In response to subparts (a), (b), (c) and (d) of this interrogatory, Union Carbide provides the following:

"Calidria" Asbestos

Journal Advertising Summary

Journal	Page(s)	Date(s)	Photographs Or Diagrams
"Chemical 26"	Unknown	7/66	Yes
"Chemical 26"	17	9/66	Yes
"TAPPI"	44A-45A	2/66	Yes
"TAPPI"	141A	3/66	Yes
"TAPPI"	155A	12/66	No
"TAPPI"	157A	12/66	Yes
"TAPPI"	149A	1/67	No
"TAPPI"	151A	1/67	Yes
"TAPPI"	153A	1/67	Yes
"TAPPI"	131A	2/67	Yes
"TAPPI"	133A	2/67	Yes
"TAPPI"	133A	267	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

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"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"	35	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	Unknown	1974 & 1975	Yes[2]

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Book"			

[1] This ad placed by Montello, Inc., a Union Carbide Distributor.

[2] This ad placed by Harwick Chemical, a Union Carbide Distributor.

(E) Yes, in most cases.

Union Carbide's custodian of record for asbestos-related documents is Mrs. Virginia Ruszczyk, Kelley, Drye & Warren LLP, 101 Park Avenue, New York, NY 10178.

INTERROGATORY NO. 42:

State if YOU have or had within YOUR corporate or other business structure any CONTRACT UNITS.

RESPONSE TO INTERROGATORY NO. 42:

The Calidria business had no "contract units". Union Carbide sold Calidria directly or through distributors to producers and manufacturers for use in their products or production processes. See Union Carbide's response to Interrogatory #29.

INTERROGATORY NO. 43:

State whether or not any of YOUR CONTRACT UNITS installed and/or removed RAW ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS in the GEOGRAPHIC AREA at any between 1930 and 1985. If so:

A. State the business addresses and name of the CONTRACT UNIT;

B. State the inclusive periods of time the CONTRACT UNITS were working in GEOGRAPHIC AREA;

C. State the name and address of each job site within the GEOGRAPHIC AREA the dates the CONTRACT UNIT worked at those job sites, and IDENTIFY the RAW ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS installed or removed on each occasion;

D. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks

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containing such data or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

RESPONSE TO INTERROGATORY NO. 43:

See Union Carbide's response to Interrogatory #42.

INTERROGATORY NO. 44:

When do YOU contend that THIS DEFENDANT first became aware that there is an association between asbestos exposure and disease in human beings?

RESPONSE TO INTERROGATORY NO. 44:

Union Carbide's knowledge concerning potential health hazards possibly associated with excessive asbestos fiber inhalation developed gradually. Sources of information as to possible health concerns of which Union Carbide is presently aware included general and scientific literature on the topic and reports or memoranda by Union Carbide employees. Upon the plaintiff's request, copies of such reports and memoranda, which Union Carbide has located, will be made available at a suitable time and place for review and duplication by the plaintiff.

Union Carbide recognizes that the excessive inhalation of asbestos fiber may be associated with the development of serious and potentially fatal disease. Union Carbide also understands that the onset and development of such disease in a person may be related to and affected by, among other factors, the particular type of fiber that is inhaled, cigarette smoking, and environmental conditions, in addition to the person's medical history and condition.

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

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request, Union Carbide will make its repository available for review and replication at a suitable time and place.

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

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. In 1972, Union Carbide offered to take dust counts of the premises of Calidria customers in order to help them maintain a safe working environment, a service which many Calidria customers utilized (Calidria was not sold to the general public or other "end-users", but rather was marketed only to manufacturers or producers who used Calidria in their products or production processes). Dr. Harrison Rhodes, an industrial hygienist, supervised Union Carbide's dust monitoring program.

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INTERROGATORY NO. 45:

How do YOU contend that THIS DEFENDANT first became aware that there is an association between asbestos exposure and disease in human beings.

RESPONSE TO INTERROGATORY NO. 45:

See Union Carbide's response to Interrogatory #44.

INTERROGATORY NO. 46:

Either (1) attach all DOCUMENTS evidencing the information upon which YOUR contentions in YOUR answers to Interrogatories No. 44 and No. 45 are based, or (2) attach disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they be made the subject of a request for production of documents.

RESPONSE TO INTERROGATORY NO. 46:

Union Carbide maintains in its asbestos-related Repository a myriad of documents which may be responsive to this Interrogatory. Upon Plaintiff's request, Union Carbide will made its Repository available to the Plaintiffs for review and replication at a suitable time and place.

INTERROGATORY NO. 47:

When did THIS DEFENDANT first warn its employees that exposure to asbestos could be hazardous to human health? State:

A. Whether the first such warning was written or oral;

B. Whether copies of DOCUMENTS containing such warning exist;

C. The IDENTITY of the custodian of such DOCUMENTS;

D. The content of the warning.

RESPONSE TO INTERROGATORY NO. 47:

See Union Carbide's Preliminary Statement. Subject to its Preliminary Statement, Union Carbide responds as follows:

The discovery process as well as Union Carbide's own internal investigation is ongoing. Union Carbide owns and has owned various plants and offices at numerous locations throughout the United States and is endeavoring to research when the first warning was actually passed on to

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its own employees. At the very least Union Carbide would have notified its own employees at the same time it also notified its customers. See Union Carbide's responses to Interrogatories No. 21, No. 41 a-d), and No. 44 for information on Union Carbide's knowledge about asbestos and information disseminated to its customers.

Union Carbide has led the industry with its concern for industrial hygiene, and Union Carbide industrial hygienists have been pioneers in their field. In 1919, less than two years after Union Carbide was created, at a time when occupational health was not an established field, the National Carbon Company division hired Dr. Girard Cranch as its Medical Director. In that capacity, Dr. Cranch and his successors have developed and launched health and hygiene programs which have been paragons for the industry. Those programs have had the intended result of avoiding or minimizing exposure of employees or other persons on Union Carbide premises to dust, generally, and asbestos dust or fiber, specifically, in accordance with Union Carbide's information and advanced state-of-the-art practices throughout Union Carbide's history.

In 1930 or shortly thereafter, standards for dusts were set which in industry were referred to as "threshold limits" beyond which workers should not be exposed. In 1937, Dr. Cranch was appointed Manager of the new corporate-wide Industrial Toxicology Department. One year later, he also took on the responsibility of Corporate Medical Director. In those capacities, he was instrumental in establishing the Mellon Institute Chemical-Hygiene Fellowship, which has been renowned for its toxicology analyses. The Institute made it possible for the chemicals used or developed by Union Carbide to be evaluated; and when necessary, animal studies could be performed to determine the toxicity of these chemicals. A labeling system was later developed to protect not only Union Carbide employees but also customers' employees.

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Upon Dr. Cranch's retirement in 1948, the medical and industrial hygiene functions were divided. Oliver Stam succeeded Dr. Cranch as a corporate level industrial hygienist. In 1953, Mr. Stam was succeeded by Paul McDaniel. (Mr. McDaniel recently retired. Dr. Marvin Huffman presently serves as toxicologist.) Also, in 1948, one Chemical Division laboratory employee, Mr. Newt Ketchum, who was working on industrial hygiene matters, was sent to Harvard University where he obtained a Master's Degree in Industrial Hygiene and thus became the first industrial hygienist in the Chemicals Division. With more physicians available at the termination of World War II, the larger plants were able to obtain full-time Medical Directors. In 1947, Dr. Carl U. Dernehl resigned an Assistant Professorship at Texas University in Galveston to accept a position at the Texas City Plant as Medical Director. (In 1955, Dr. Dernehl was transferred to New York as Assistant Medical Director. Mr. Dernehl recently retired.)

In the early 1960's, Drs. Carl Dernehl and K.S. Lane of Union Carbide's Medical Department were given the corporate level positions of Director and Assistant Director of Toxicology, respectively. Starting in the early 1970's, Dr. Harrison Rhodes, an industrial hygienist, supervised Union Carbide's dust count program for Calidria customers until June 30, 1985, when Union Carbide sold the Calidria business.

In 1953, Mr. McDaniel proposed a program for air pollution control as well as control of the working environment. He also made recommendations for reduction of dusts and fumes as well as noise control. In 1962, hygienists in Union Carbide's South Charleston, West Virginia facility conducted comparative dust emission studies between competing asbestos insulation products. Those studies were conducted as part of an ongoing offer to prevent or minimize asbestos dust exposure.

When the Occupational Health and Safety Act became effective in 1970, Union Carbide had a well established health and industrial hygiene program for all domestic plants. Every plant, regardless of size, had a designated local physician who would provide emergency service, conduct a pre-employment physical examination on all new hires as well as periodic examinations on certain employees based on job assignment, physical condition, age, etc. The

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Plant Physician also advised the Plant Manager regarding local health problems and provided limited health services, first aid, immunizations, and advice to employees.

For an extensive period of time, all major Union Carbide facilities have also employed industrial hygienists and industrial hygiene staff on their premises. Union Carbide's divisions also employ a division-wide industrial hygienist and staff to oversee all facilities. Industrial hygienists report, ultimately, to the Vice President for Community and Employee Health, Safety and Environmental Protection, who is also responsible for establishing corporate HS&EP standards and for assessing business group performance against those standards and applicable governmental requirements. Presently, Ronald Van Mynen serves as Vice President in that capacity.

INTERROGATORY NO. 48:

Did THIS DEFENDANT ever issue a written COMPANY policy discontinuing warning its employees that exposure to asbestos could be hazardous to human health? If so,

A. Provide the date;

B. Describe the circumstances; and

C. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

RESPONSE TO INTERROGATORY NO. 48:

See Union Carbide's Preliminary Statement. Subject to its Preliminary Statement, Union Carbide responds as follows:

No. Union Carbide had no such policy. See also Union Carbide's response to Interrogatory No. 47.

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INTERROGATORY NO. 49:

Did THIS DEFENDANT provide any Independent Contractor or Subcontractor within the GEOGRAPHIC AREA with a written warning that exposure to asbestos could be hazardous to human health.

RESPONSE TO INTERROGATORY NO. 49:

Union Carbide maintains in its asbestos-related Repository a category called Customer Call Reports. These files are stored alphabetically by customer-name. Had one of these contractors been a customer, references to discussions with customers as well as a listing of documents which may have been specifically forwarded to that customer would be filed in this section. Upon Plaintiffs' request, Union Carbide will make its repository available to the Plaintiffs for review and replication at a suitable time and place.

See also Union Carbide's responses to Interrogatories #37 and #40.

INTERROGATORY NO. 50:

Has THIS DEFENDANT been cited for or otherwise charged by a public agency with a violation in the GEOGRAPHIC AREA of any statute, ordinance, safety order, regulation, or law pertaining to asbestos exposure? For each occasion, IDENTIFY:

A. The code section, safety order, statute, or regulation for which THIS DEFENDANT had been cited or otherwise charged;

B. The date(s) thereof;

C. The agency or other governmental unit which issued the citation or otherwise charged YOU.

D. All persons known to YOU with information relevant to the incident;

E. What was the ultimate resolution.

RESPONSE TO INTERROGATORY NO. 50:

According to Union Carbide's best presently available information, Union Carbide was never so cited or charged in connection to the sale of Calidria.

INTERROGATORY NO. 51:

If THIS DEFENDANT has ever owned or operated a railroad, state:

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A. The IDENTITY of each such railroad, including the name(s) of such railroad during the time period of YOUR ownership and/or operation, the principal place of business of such railroad and the dates of YOUR ownership and/or operation;

B. The geographic area of operation of such railroad;

C. The name(s) of such railroad prior to YOUR ownership and/or operation;

D. The IDENTITY of the person or entity from whom YOU purchased your ownership or operating interest, and the date of such purchase;

E. The IDENTITY of the person or entity to whom YOU sold your ownership or operating interest, and the date of such sale;

F. Whether copies of DOCUMENTS evidencing your ownership/operation and/or sale exist;

G. The IDENTITY of the Custodian of such DOCUMENTS;

H. To the extent that information has not been given in answers to Interrogatory Nos. 32 and 33, the information requested in Interrogatory Nos. 32 and 33, for each railroad owned or operated by YOU.

RESPONSE TO INTERROGATORY NO. 51:

Not applicable.

INTERROGATORY NO. 52:

If DEFENDANT has ever owned or operated a shipyard, state:

A. The IDENTITY of each such shipyard, including the name(s) of such shipyard during the time period of YOUR ownership and/or operation, the place of business of such shipyard and the dates of YOUR ownership and/or operation;

B. The name(s) of such shipyard prior to YOUR ownership and/or operation;

C. The IDENTITY of the person or entity to whom YOU sold your ownership operating interest, and the date of such sale;

D. Whether copies of DOCUMENTS evidencing your ownership/operation and/or sale exist;

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E. Whether any representative of THIS DEFENDANT attended the Maritime Commission Conference in December 1942 in Chicago, Illinois? If so, IDENTIFY any such representative of THIS DEFENDANT;

F. The IDENTITY of the Custodian of such DOCUMENTS;

G. To the extent that information has not been given in answers to Interrogatory No. 32, the information requested in Interrogatory No. 32, for each shipyard owned or operated by YOU.

RESPONSE TO INTERROGATORY NO. 52:

Not applicable.

INTERROGATORY NO. 53:

At any time between 1930 and 1985, did you import, export, ship, transship or otherwise transport RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS into, out of or through any port in the GEOGRAPHIC AREA? If so, for each occasion:

A. IDENTIFY and describe the NATURE and amount of RAW ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS;

B. IDENTIFY the ship or ships (including the owners and operators thereof) onto or from which the RAW ASBESTOS and ASBESTOS-CONTAINING PRODUCTS were loaded, unloaded or shipped;

C. State the dates, port and pier involved for each occasion;

D. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

RESPONSE TO INTERROGATORY NO. 53:

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

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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.

See also Union Carbide's response to Interrogatory #29.

DATED: November 21, 1997

HAIGHT, BROWN & BONESTEEL, L.L.P.

By Carrie A Bauccio
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VERIFICATION

STATE OF CONNECTICUT)
) ss:
COUNTY OF FAIRFIELD)

JOHN MACDONALD, being duly sworn according to law, deposes and says: that he is Assistant Secretary of defendant Union Carbide Corporation, that he has read the Responses to Plaintiff's General Order #129 Interrogatories and is familiar with its contents; that the Responses were assembled and prepared by employees, former employees and counsel of defendant who have informed deponent that the Responses are true to the best of their knowledge; and that to the best of deponent's knowledge, information and belief, the Responses are true.

John Macdonald
Assistant Secretary

Sworn to before me this 5th day
of November, 1997.

Notary Public

DIANE E. GOLDEN
NOTARY PUBLIC
MY COMMISSION EXPIRES 11/30/2001

NY32/ALOU/67531.21

IN RE COMPLEX ASBESTOS LITIGATION SERVICE LIST

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