

- (b) State the date(s) during which asbestos-containing products and/or raw asbestos were manufactured or processed, at said facility; and,
- (c) Identify each person serving as the manager or supervisor of said facility during any time which the facility has been owned and/or operated by Defendant, any predecessor or any related company, and state the date(s) of the tenure as manager or supervisor for each.

RESPONSE:

See General Objections Nos. 1-8. Union Carbide further objects to this Interrogatory on the ground that it is overly broad. Subject to its objections, Union Carbide responds as follows:

See Union Carbide's Responses to Interrogatory Nos. 16 and 23.

Calidria is a unique short-fiber chrysotile asbestos uncontaminated by tremolite, which Union Carbide extracted from an asbestos ore deposit in the New Idria area of San Benito County in California which was discovered in 1957. The mining was performed by a small number of employees and sub-contractors and was carried out every year or every other year, depending on the circumstances, during the period May to October. The ore deposit was mined by conventional open pit methods. The Calidria asbestos that was mined was stored until processed at Union Carbide's plant located near King City, California.

Union Carbide first employed former employee John Myers in May 1951. Mr. Myers was involved in various aspects of Union Carbide'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 Calidria asbestos. He served in the Metals Division as Product and Production Manager for Calidria asbestos from 1981 to June 30, 1985.

Union Carbide manufactured asbestos containing phenolic molding compounds at its Bound Brook facility in New Jersey from approximately 1939 until 1975.

Union Carbide did not own or operate any facility located in Joilet, Illinois. Furthermore, Union Carbide did not manufacture or process any asbestos-containing products, or raw asbestos at any facility or facilities it may have owned in Louisville, Kentucky.

INTERROGATORY NO. 39: Identify any and all entities to which the defendant, any predecessor or related company, sold, distributed or otherwise provided any type of asbestos-containing product, including but not limited to, the products listed in response to original Interrogatory number 19, and which the defendant has any reason whatsoever to suspect, believe, think or otherwise conclude that said asbestos-containing product was installed, applied, stored, or anyway made use of at any site listed in the Exhibit "A", at any site located in Madison County, Illinois, or at any site within a 200 mile radius of Madison County, Illinois.

RESPONSE:

See General Objections Nos. 1-8. Union Carbide further objects to this Interrogatory on