

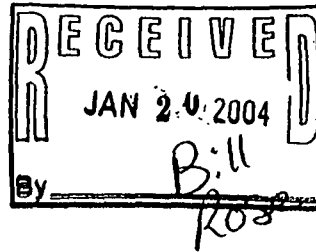
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IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

IN RE: ALL ASBESTOS LITIGATION
FILED BY THE SIMMONS FIRM, LLC,
Plaintiffs

vs.

A.W. CHESTERTON, et al.,
Defendants.



**DEFENDANT UNION CARBIDE CORPORATION'S RESPONSES TO
PLAINTIFFS' FIFTH AMENDED AND SUPPLEMENTAL INTERROGATORIES**

PRELIMINARY STATEMENT

Pursuant to Section III.A.6 of the Standing Case Management Order For All Asbestos Personal Injury Cases in Madison County, set forth below are the Responses of Defendant Union Carbide Corporation ("Union Carbide") to Plaintiffs' Fifth Amended and Supplemental Interrogatories.

The Interrogatory Responses of Union Carbide set forth herein are answered in accordance with the rulings of Judge Nicolas G. Byron, issued during the Hearing on Objections to Interrogatories in In re: All Asbestos Litigation Filed by the Simmons Firm LLC on April 13, 2000. A copy of the Order reflecting the Court's rulings is attached hereto as Exhibit A.

To the extent that Union Carbide has asserted objections to Interrogatories that have been previously addressed by the Court, such objections are asserted for purposes of the record only.

GENERAL OBJECTIONS

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

GENERAL OBJECTION NO. 1

Union Carbide states that trial preparation and factual investigation are ongoing. Union Carbide's responses 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. By this reservation, Union Carbide