

- (b) Identify each company, corporation or business for which each such officer or director served, each position held by such officer or director for such other company, corporation or business, and the time periods each position was held.

RESPONSE:

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

To the extent that information responsive to this Interrogatory is in the possession of Union Carbide, this information is located in the repositories maintained by Union Carbide's counsel.

INTERROGATORY NO. 10: Has Defendant ever acquired, through purchase, reorganization or merger, another company, corporation or business which manufactured, sold, processed, distributed or contracted to apply, asbestos and/or asbestos-containing products?

RESPONSE:

See General Objections 1-8. Union Carbide further objects to this Interrogatory on the ground that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

In 1939 Union Carbide and Carbon Company merged with the Bakelite Corporation. Prior to the merger, the Bakelite Corporation manufactured phenolic molding compounds, some of which contained asbestos. Union Carbide ceased manufacturing and selling asbestos-containing phenolic molding compounds by 1975.

In 1977, Union Carbide acquired a company which prior to its acquisition by Union Carbide had manufactured a line of mastics, 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 a subsidiary which produced these products and ceased producing all asbestos containing products (except for TRE-HOLD, a tree sprout inhibitor) prior to Union Carbide's acquisition of the company. In addition, there were some welding and gas distributors that were acquired by Union Carbide which may also have sold asbestos products.

INTERROGATORY NO. 11: If the answer to Interrogatory No. 10 is "Yes," with respect to each such predecessor:

- (a) State its full and correct name;
- (b) State its principal place of business;