

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

Union Carbide was not provided with an "Exhibit A", as such Union Carbide is unable to respond to the portion of this Interrogatory pertaining to "Exhibit A." Information relating to the sales of Calidria and asbestos-containing phenolic molding compounds is located in the repositories maintained by Union Carbide's counsel. Upon Plaintiffs' request and identification of individual relevant customers, Union Carbide will provide copies of records of any sales to such customers, if records exist and are in the possession of Union Carbide's counsel.

INTERROGATORY NO. 40: Identify any and all persons known by you to have any knowledge concerning the manufacture, sale, distribution, possession, application, installation or use of the products listed in response to Interrogatory No. 19.

RESPONSE:

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

Information responsive to this Interrogatory, and in the possession of Union Carbide, is located in the repositories maintained by Union Carbide's counsel.

See also Union Carbide's Response to Interrogatory Nos. 38 and 117.

INTERROGATORY NO. 41: Has Defendant, any predecessor or any related company, at any time, designed, manufactured, processed, sold, distributed, supplied, applied, installed or contracted to apply or install any product which contained vermiculite?

RESPONSE:

See General Objections Nos. 1-8. Union Carbide further objects to this Interrogatory on the grounds that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide further objects to this Interrogatory to the extent that it calls for information about Union Carbide employees or premises, or policies pertaining to Union Carbide employees or premises that are unrelated to the claims in this litigation on the grounds that such requests are overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

See Union Carbide's Response to Interrogatory Nos. 10, 19, and 22.

INTERROGATORY NO. 42: If your answer to Interrogatory No. 41 is "Yes," identify