

GENERAL OBJECTION NO. 6:

Union Carbide objects to this entire set of Interrogatories to the extent that they seek information contained in documents that are available to Plaintiff's counsel in the repositories (the "repositories") maintained by Union Carbide's counsel. The repositories are supplemented as additional documents are identified and have been supplemented in the past year. Upon request, a visit to the repositories by Plaintiff's counsel can be arranged at a mutually convenient time. The burden of determining the responses to these Interrogatories is equally as demanding on Plaintiff's counsel as it is on Union Carbide. The burden on Union Carbide is enhanced because many of the events and circumstances that appear to be at issue took place approximately 40 years ago. With the passage of time, complete records may no longer exist, relevant witnesses with firsthand knowledge are now deceased, memories have faded, and any attempt to recreate history often presents an insurmountable challenge and an undue burden.

GENERAL OBJECTION NO. 7:

Calidria is not an "asbestos-containing product," as referred to by Plaintiff in these Interrogatories. Calidria is a unique short-fiber chrysotile asbestos uncontaminated by tremolite which Union Carbide extracted from an asbestos ore body in the New Idria area of San Benito County in California. Calidria was marketed and sold by Union Carbide or by Calidria distributors to manufacturers or producers who incorporated and used Calidria in their products or production processes. From 1963 to 1985, Union Carbide sold Calidria asbestos fiber to various third party manufacturers or distributors. The asbestos third party manufacturers to whom Union Carbide sold Calidria used it in manufacturing various products used in commercial applications. Union Carbide did not manufacture those products and had no control over the nature of the products in which the fiber was used. Nevertheless, Union Carbide consistently provided its customers with health and safety information regarding the health effects of asbestos so that, among other things, this information could be passed along to the third party manufacturers' customers.

GENERAL OBJECTION NO. 8:

Union Carbide objects to providing information about any of its products other than Calidria asbestos or phenolic molding compounds and phenolic resins. Any request for documents or information relating to any Union Carbide products other than Calidria asbestos or phenolic molding compounds and phenolic resins is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.