

does not in any way assume a continuing responsibility to update its responses to these Interrogatories, and specifically objects to each Interrogatory that seeks to impose any such continuing obligation upon Union Carbide to the extent not required by Illinois law. To the extent the information contained herein differs in any respect from any prior responses to discovery, these responses shall be deemed to update and supersede such prior responses.

GENERAL OBJECTION NO. 2:

Union Carbide objects to Plaintiff's Interrogatories in their entirety on the grounds that they are not reasonably framed in terms of the facts and subject matter of the present action, with the result that Union Carbide is called upon to speculate as to what information relevant to the present case, if any, may be deemed to fall within the scope of these Interrogatories as phrased. In addition, Union Carbide objects to this set of Interrogatories to the extent that they seek the production of information not relevant to any matter at issue in this litigation.

GENERAL OBJECTION NO. 3:

Union Carbide objects to these Interrogatories insofar as they would require the disclosure of information protected by the attorney-client privilege or work product doctrine.

GENERAL OBJECTION NO. 4:

Union Carbide acquired mineral rights to its Coalinga mine in 1958. From 1958 until late 1963, Union Carbide developed its mining and milling processes. From late 1963 until June 30, 1985, Union Carbide mined and sold a unique tremolite-free short-fiber chrysotile asbestos initially known as "Union Carbide Asbestos" and then under the trade name "Calidria" (some distributors marketed Calidria under other trade names). Throughout the time that Union Carbide was in the asbestos business, and particularly from 1963 to 1965, sales were relatively small. Even as Union Carbide attempted to develop business, Union Carbide remained a relatively small participant with its focus, due to the unique nature of Calidria, on developing applications suitable for the unique fiber.

GENERAL OBJECTION NO. 5:

Union Carbide objects to this entire set of Interrogatories to the extent that they call 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.