

RECEIVED

MAR 10 1986

11 WORSTFILL

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

AT CHARLESTON

ERNEST LEE STEVENS and
CAROLYN SUE STEVENS,

Plaintiffs,

vs.

CIVIL ACTION NO. 82-2483

UNION CARBIDE CORPORATION, a
corporation; and FMC CORPORATION,
a corporation,

Defendants.

INTERROGATORIES TO UNION
CARBIDE CORPORATION

TO: Union Carbide Corporation and its attorney,
Winfield T. Shaffer, Esquire
Jackson, Kelly, Holt & O'Farrell
Post Office Box 553
Charleston, West Virginia 25322

Pursuant to the Federal Rules of Civil Procedure, the
Plaintiff requests that the defendants answer under oath within
the time provided by law, from the service hereof, the following
interrogatories:

A. When used in these Interrogatories, the term
"Defendant" or any synonym thereof is intended to and shall em-
brace and include, in addition to Defendant, counsel for de-
fendant, and all agents, servants, employees, representatives,
private investigators and others who are in possession of or may
have obtained information for or on behalf of the defendant.

UCC 098993

B. These Interrogatories shall be deemed continuing and supplemental answers shall be required if Defendant, directly or indirectly, obtains further information of the nature sought herein between the time answers are served and the time of trial.

1. Please list all known or suspected carcinogens handled, used, produced or manufactured between January 1, 1968, and December 31, 1983, at the Union Carbide facility located at South Charleston, West Virginia, including the loading and storage facility located adjacent to the area commonly referred to as North Charleston.

2. Were any of the above substances, in either their pure form or as part of another product, loaded, unloaded or stored at the storage and loading facility located adjacent to the area commonly referred to as North Charleston between January 1, 1968, and December 31, 1983? If so, provide the following:

(a) Describe the quantity stored, loaded or unloaded in each year.

3. Does the defendant, Union Carbide, have knowledge of any reports, memoranda or documentation either prepared by Union Carbide or by some other person, firm, corporation or governmental agency, relating to the effects of the emissions, releases or spills, whether accidental or expected, of known or suspected carcinogens from their South Charleston facility including the loading and storage facility adjacent to the area commonly known as North Charleston from January 1, 1968 to the present? If so, for each provide the following information:

(a) The date of the report;

UCC 098994

(b) The name and address of the person, firm, corporation or governmental agency preparing the report;

(c) A description of the findings of the report or, in lieu thereof, attach a copy of such report to your answers to these interrogatories.

4. State the names and addresses of all witnesses who will testify on behalf of the defendant at the trial of the above-styled civil action and provide a brief summary of the facts to which they will testify.

5. State the names and addresses of all witnesses who have knowledge of either the circumstances surrounding the accident or the injuries claimed to have been sustained by the plaintiff and plaintiff's decedent, who the defendant does not intend to call as witnesses in the above-styled civil action.

6. Does the defendant intend to call any expert witnesses for the purpose of obtaining their opinions at the trial of the above-styled civil action? If so, please state:

(a) The names and addresses of such witnesses and their qualifications in the field in which you intend to qualify them as an expert;

(b) For each witness, please state any opinions that are held by them with reference to the circumstances surrounding the casualty complained of;

(c) Has the defendant received any reports, memorandums or other written information from the said expert relating to the casualty complained of;

(d) In lieu of filing a Motion for the Production of Documents and Things, will the defendant attach a copy of said written documentation to the answers to these interrogatories?

7. Excluding what has been requested and supplied in response to the preceding interrogatory, has the defendant received any other written reports or memorandums from any other expert retained by him regarding the casualty complained of? If so, please provide the following:

- (a) The name and address of the preparer of that report and its date.



William C. Field
603 Virginia Street, East
Charleston, West Virginia 25301
Counsel for Plaintiffs

ERNEST LEE STEVENS and
CAROLYN SUE STEVENS
By Counsel