INTERROGATORY NO. 16: State the first and last dates on which any asbestos-containing product was manufactured by:

(a) Defendant;

(b) each and every predecessor; and,

(c) each and every related company.

RESPONSE:

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

Calidria is not an "asbestos-containing product." 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. In June of 1985, Union Carbide ceased mining, milling, and selling Calidria asbestos.

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.

INTERROGATORY NO. 17: State the first and last dates on which any asbestos-containing product was specified, sold, distributed, applied and/or installed within the United States by:

(a) Defendant;

(b) each and every predecessor; and,

(c) each and every related company.

RESPONSE:

See General Objections Nos. 1-8. Union Carbide further objects to this Interrogatory on the ground that it is overly broad. 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