

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.

No, with respect to phenolic molding compounds. Phenolic resins and phenolic molding compounds were intermediate materials, sold to manufacturers who would use them, and other ingredients, to mold or manufacture other products.

INTERROGATORY NO. 32: If your answer to Interrogatory No. 31 was "No" with respect to any product(s), explain in what manner Defendant claims said product(s) were altered or substantially changed after sale or distribution and before reaching the consumer or user.

RESPONSE:

See Union Carbide's Response to Interrogatory No. 31, including all objections set forth therein.

INTERROGATORY NO. 33: With respect to each product listed in response to Interrogatory No. 19, state whether, based upon the material contents, the method of manufacturing, and the method of application, such product could generally be applied or installed without liberating asbestos fibers?

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. Subject to its objections, Union Carbide responds as follows:

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