

therein.

INTERROGATORY NO. 101: Identify any and all agreements, oral or written, between or among Defendant, any of the other defendants in this lawsuit, any organization, association or other entity including, but not limited to, those identified in your answer to Interrogatory No. 94 and/or any medical or scientific foundations, relating to the standardization of:

- (a) Specifications for asbestos cloth products;
- (b) Specifications for paper or burlap bags, or other packaging to be used for the transport and/or storage of asbestos cement;
- (c) Warning or caution labels to be applied to asbestos products and/or their packaging, cartons, containers, or boxes;
- (d) Methods of dissemination of public relations information to defendant's purchasers, advertisers, distributors, factory workers, contractors, insulators, users, consumers of asbestos products and/or the general public;
- (e) Safety equipment and/or protective clothing to be utilized while handling defendant's asbestos products;
- (f) Medical programs to be offered or sponsored by defendant.

RESPONSE:

See General Objections Nos. 1-8. Union Carbide further objects to this Interrogatory on the grounds it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent that information responsive to this Interrogatory is in the possession of Union Carbide, this information is located in the repositories maintained by Union Carbide's counsel.

INTERROGATORY NO. 102: Did Defendant, any predecessor or related company, direct to be performed, sponsor in whole or in part, finance in whole or in part, receive the results of, or become aware of, any studies or tests performed by the Saranac Lake Laboratory of the Trudeau Foundation relating to asbestos exposure and its effects upon human health?

RESPONSE:

See General Objections Nos. 1-8. Union Carbide further objects to this Interrogatory on the grounds it is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and vague and ambiguous as to the terms "become aware of". Subject to its objections, Union Carbide responds as follows:

To the extent that information responsive to this Interrogatory is in the possession of Union Carbide, this information is located in the repositories maintained by Union Carbide's