

Union Carbide Corporation, P.O. Box 8361, South Charleston,
West Virginia, 25303 and R. N. Wheeler, Jr., Assistant Director,
Product Safety, Union Carbide Corporation, same address.

INTERROGATORY NO. 2

Identify the location and date of any and all fires
to your knowledge which have been alleged, reported or determined
to have been caused (in whole or in part), spread, or fueled
in any way by PVC.

ANSWER:

Union Carbide Corporation objects to this interrogatory
on the ground that it is overly broad and vague. However, without
waiving its objection, Union Carbide Corporation states that,
as to polyvinyl chloride wire insulation, it is aware that claims
have been made that the wire insulation fueled or spread the
development of a fire. These claims were made in the litigation
involving the Beverly Hills Supper Club fire and in press and
journal reports of other fires such as a fire on December 10,
1975 at a Washington, D.C., office building at 2020 K Street,
the Lower Manhattan Telephone Exchange fire and the article authored
by V. H. Esch.

Union Carbide Corporation denies that it has ever been
determined that a fire was caused or spread by polyvinyl chloride
wire insulation.

INTERROGATORY NO. 3

If Defendant has ever been sued in any Court for
damages, the subject of which suit in any way related to PVC
or any plasticiser utilized with PVC or with regard to a product
involving the use of a PVC resin or compound (under any theory,
including negligence, warranty, strict liability, misrepresentation,
etc.), state:

a. The names and citation of all such lawsuits and
the court wherein each lawsuit was filed.

b. The factual allegations of each such lawsuit.

and the type of product. Before that was done the manufacturer was identified by colored marker threads inserted between the conductor wire and the insulation material. The threads are registered with Underwriters Laboratories, Inc. with the names of the manufacturers using them.

INTERROGATORY NO. 26

Have you ever attended any formal or informal meeting, conference, seminar or discussion wherein it was decided, implied or mentioned or otherwise discussed that information concerning the thermal degradation of PVC or plasticisers to be utilized with PVC as wire insulation or the characteristics or emission of toxic gases or flame spread of said PVC or plasticiser should not be distributed to the public or that such information not be made available for public dissemination. If so, state:

- a. The identity of all parties attending such meeting, conference, seminar or discussion.
- b. The location of said meeting, conference, seminar or discussion.
- c. The dates of each such meeting, conference, seminar or discussion.

ANSWER:

Union Carbide Corporation has no record of any formal or informal meeting, conference, seminar, or discussion wherein it was decided, implied, mentioned or otherwise discussed that information concerning the thermal degradation of pvc or plasticizers to be utilized with pvc as wire insulation or the characteristics or emission of toxic gases or flame spread of said pvc or plasticizer should not be distributed to the public or that such information not be made available for pulbic dissemination.

INTERROGATORY NOS. 27 through 43

Interrogatory Nos. 27 through 43, inclusive, are not directed at this answering defendant, Union Carbide Corporation.

b. Your annual dues during the time you have been a member.

c. List the committees, subcommittees or subgroups which you or any of your employees have been members of and set forth the name of the employee for each committee, subcommittee or subgroup.

ANSWER:

Yes, Union Carbide Corporation is a member of the Society of Plastics Industry, Inc.

a. Union Carbide Corporation has been a member of SPI from 1937 to the present.

b. Union Carbide Corporation objects to this subsection as overly broad and inclusive and because it seeks information which would not be relevant and would not lead to the discovery of admissible evidence.

c. The list of committees and identities of employees of Union Carbide Corporation relevant to the subject matter of this action, who were members will be made available to plaintiffs' counsel when the investigation has been completed. However, Mr. R. N. Wheeler, Jr. was a member, at various times, of the following SPI committees: Vinyls and Vinyl Acetate Committee, PVC Manufacturing Technology Committee, PVC Fire Safety Committee, AN Polymers Group, PVC Health Committee.

INTERROGATORY NO. 61

Identify any and all patents, patents pending, patent applications, or patent litigation which to your knowledge involves, directly or indirectly, any PVC resin or compound or plasticiser for use as electric or communications wire insulation or covering.

ANSWER:

See answer to No. 58.

copies of all documents relating to such comparisons or tests to your answers to these interrogatories.

ANSWER:

Union Carbide Corporation did not participate in or perform such a study or test.

INTERROGATORY NO. 70

Have you destroyed or secreted any documents, the subject of which is in whole or in part the toxicity of PVC or any plasticiser upon thermal degradation. If affirmative, identify and describe all such documents and set forth the reason for any such destruction.

ANSWER:

To the best of its knowledge, no.

INTERROGATORY NO. 71

Have you ever submitted any product containing PVC for use as electric or communications wire insulation or covering to either Underwriters Laboratories, Inc. or The Society of the Plastics Industry, Inc. for testing, research, listing or approval. If affirmative, set forth the following for each such product:

- a. The identity of its manufacturer.
- b. The date of its manufacture.
- c. The place of its manufacture.
- d. The identity of the source from which its component products were purchased.
- e. Its model numbers.
- f. Its trade name.
- g. Its type, specifications ratings and dimensions.

D. State in detail all information known to you (giving the factual basis for each answer) on the following factors at the various temperatures listed below, of PVC resin.

Attach copies of all documents which comprise the factual basis for your answers to these interrogatories:

1. emission of toxic gases;
2. carbon monoxide and carbon dioxide buildup;
3. oxygen depletion;
4. heat generation, including temperature rise and convection of the products of its combustion;
5. loss of or impediment to visibility and disorientation;
6. effect of the products of its combustion on human eyes, nose, throat and respiratory system.

Please provide the above information assuming exposure of PVC resin compounds to each of the following temperatures:

- (a) 100°F
- (b) 150°F
- (c) 200°F
- (d) 212°F
- (e) 250°F
- (f) 300°F
- (g) 350°F
- (h) 400°F
- (i) 500°F
- (j) 600°F
- (k) 700°F
- (l) 1000°F
- (m) 2000°F

E. State in detail all information known to you (giving the factual basis for each answer) on the following factors at the various temperatures listed below, of all plasticizers commonly used in PVC building wire insulation. Attach copies of all documents which comprise the factual basis for your answers to these interrogatories:

1. emission of toxic gases;
2. carbon monoxide and carbon dioxide buildup;
3. oxygen depletion;
4. heat generation, including temperature rise and convection of the products of its combustion;
5. loss of or impediment to visibility and disorientation;

6. effect of the products of its combustion on human eyes, nose, throat and respiratory system.

Please provide the above information assuming exposure of all plasticizers commonly utilized in PVC building wire insulation compounds to each of the following temperatures:

- (a) 100°F
- (b) 150°F
- (c) 200°F
- (d) 212°F
- (e) 250°F
- (f) 300°F
- (g) 350°F
- (h) 400°F
- (i) 500°F
- (j) 600°F
- (k) 700°F
- (l) 1000°F
- (m) 2000°F

F. State in detail all information known to you (giving the factual basis for each answer) on the following factors at the various temperatures listed below, of all plasticizers commonly utilized in PVC computer wire insulation. Attach copies of all documents which comprise the factual basis for your answers to these interrogatories:

- 1. emission of toxic gases;
- 2. carbon monoxide and carbon dioxide buildup;
- 3. oxygen depletion;
- 4. heat generation, including temperature rise and convection of the products of its combustion;
- 5. loss of or impediment to visibility and disorientation;
- 6. effect of the products of its combustion on human eyes, nose, throat and respiratory system.

Please provide the above information assuming exposure of all plasticizers commonly utilized in PVC computer wire insulation compounds to each of the following temperatures:

- (a) 100°F
- (b) 150°F
- (c) 200°F
- (d) 212°F
- (e) 250°F
- (f) 300°F
- (g) 350°F
- (h) 400°F
- (i) 500°F
- (j) 600°F

- (k) 700°F
- (l) 1000°F
- (m) 2000°F

G. State in detail all information known to you (giving the factual basis for each answer) on the following factors at the various temperatures listed below, of all plasticizers commonly used in PVC communication wire insulation. Attach copies of all documents which comprise the factual basis for your answers to these interrogatories:

1. emission of toxic gases;
2. carbon monoxide and carbon dioxide buildup;
3. oxygen depletion;
4. heat generation, including temperature rise and convection of the products of its combustion;
5. loss of or impediment to visibility and disorientation;
6. effect of the products of its combustion on human eyes, nose, throat and respiratory system.

Please provide the above information assuming exposure of all plasticizers commonly utilized in PVC communication wire insulation compounds to each of the following temperatures:

- (a) 100°F
- (b) 150°F
- (c) 200°F
- (d) 212°F
- (e) 250°F
- (f) 300°F
- (g) 350°F
- (h) 400°F
- (i) 500°F
- (j) 600°F
- (k) 700°F
- (l) 1000°F
- (m) 2000°F

INTERROGATORY NO. 44: State whether or not the Defendant
has any PVC insulated electric, communication or computer
wire, or any PVC resin or PVC compound or any other PVC
wire insulation ingredient to Defendants, Northwestern Bell
Telephone Co., Data Line Corporation, Datatec Industries,
Inc., American District Telegraph Company of Iowa, The National
Cash Register Company, Electrical Engineering and Equipment
Company, Johnson Electric, or Younkers, Inc. in the last
25 years. If affirmative, state:

- (a) the date or dates of each sale;
- (b) to whom sold;
- (c) the quantity of wire or other ingredient
sold;
- (d) A detailed identification and description
of the product involved in the sale or sales;
- (e) the invoice number or numbers of other documents
evidencing said sale or sales;
- (f) please attach copies of all invoices or other
written documents evidencing the sales referred to
above.

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INTERROGATORY NO. 13: Have you ever become aware that
PVC building wire insulation:

A. (1) when exposed to sufficient heat was capable
of ignition or flame; and if so, set forth the temperature
at which it would occur;

(2) when exposed to sufficient heat was capable
of contributing to the spread of fire; and if so, set
forth the temperature at which this could occur;

(3) when thermally degraded but prior to ignition
or flame, was capable of becoming a hazard to firefighters
or persons in structures due to emission of toxic gases;

(4) Once ignited was capable of adversely affecting
the eyes, nose, throat and breathing of firefighters
or persons in structures due to emission of excessive
amounts of smoke;

(5) when thermally degraded was capable of adversely
affecting the eyes, nose, throat and breathing of fire-
fighters or persons in structures due to emission of
toxic gases.

B. In regard to the answers contained in A above,
state:

(1) the circumstances surrounding your acquisition
of such knowledge, including

(a) the dates on which you acquired such
knowledge, and

(b) from whom you acquired such knowledge;

(c) identify and describe all test data
and results, and

(2) attach copies of all documents relating to
your acquisition of such knowledge to your answers
to these interrogatories.

C. If your answer to any question above would be different
for PVC computer wire insulation or communications wire
insulation, please so indicate and provide the requested
information for these items also.

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INTERROGATORY NO. 14: Provide a summary of the scientific and technical information known to you as of November 5, 1978, with respect to:

(a) any toxicity potential of PVC building wire, communication wire or computer wire insulation when it is thermally degraded but prior to actual ignition;

(b) any combustion potential of PVC building wire, communication wire or computer wire insulation when it is thermally degraded to the point of ignition;

(c) any flaming potential of PVC building wire, communication wire or computer wire insulation when it is thermally degraded to the point of ignition;

(d) any alleged or actual danger to building occupants of PVC building wire, communication wire or computer wire insulation when it is thermally degraded to the point of ignition;

(e) any alleged defective condition of PVC building wire, communication wire or computer wire insulation when it is thermally degraded or when it becomes ignited;

(f) any emission of combustible vapors prior to actual ignition or its flaming;

(g) any characteristic of PVC building wire, communication wire or computer wire insulation when thermally degraded or in a flaming mode that you have attempted to change or have actually changed from that compound or formulation originally utilized in the market place, including, but not limited to, ignition, flame and/or smoke emission.

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INTERROGATORY NO. 14: Provide a summary of the scientific and technical information known to you as of November 5, 1978, with respect to:

(a) any toxicity potential of PVC building wire, communication wire or computer wire insulation when it is thermally degraded but prior to actual ignition;

(b) any combustion potential of PVC building wire, communication wire or computer wire insulation when it is thermally degraded to the point of ignition;

(c) any flaming potential of PVC building wire, communication wire or computer wire insulation when it is thermally degraded to the point of ignition;

(d) any alleged or actual danger to building occupants of PVC building wire, communication wire or computer wire insulation when it is thermally degraded to the point of ignition;

(e) any alleged defective condition of PVC building wire, communication wire or computer wire insulation when it is thermally degraded or when it becomes ignited;

(f) any emission of combustible vapors prior to actual ignition or its flaming;

(g) any characteristic of PVC building wire, communication wire or computer wire insulation when thermally degraded or in a flaming mode that you have attempted to change or have actually changed from that compound or formulation originally utilized in the market place, including, but not limited to, ignition, flame and/or smoke emission.

INTERROGATORY NO. 15:

A. State in detail all information known to you (giving the factual basis for each answer) on the following factors at the various temperatures listed below, of PVC building wire insulation. Attach copies of all documents which comprise the factual basis for your answers to these interrogatories:

1. emission of toxic gases;
2. carbon monoxide and carbon dioxide buildup;
3. oxygen depletion;
4. heat generation, including temperature rise and convection of the products of its combustion;
5. loss of or impediment to visibility and disorientation;
6. effect of the products of its combustion on human eyes, nose, throat and respiratory system.

Please provide the above information assuming exposure of PVC building wire insulation compounds to each of the following temperatures:

- (a) 100°F
- (b) 150°F
- (c) 200°F
- (d) 212°F
- (e) 250°F
- (f) 300°F
- (g) 350°F
- (h) 400°F
- (i) 500°F
- (j) 600°F
- (k) 700°F
- (l) 1000°F
- (m) 2000°F

B. State in detail all information known to you (giving the factual basis for each answer) on the following factors at the various temperatures listed below, of PVC computer wire insulation. Attach copies of all documents which comprise the factual basis for your answers to these interrogatories:

1. emission of toxic gases;
2. carbon monoxide and carbon dioxide buildup;
3. oxygen depletion;
4. heat generation, including temperature rise and convection of the products of its combustion;

5. loss of or impediment to visibility and disorientation;

6. effect of the products of its combustion on human eyes, nose, throat and respiratory system.

Please provide the above information assuming exposure of PVC computer wire insulation compounds to each of the following temperatures:

- (a) 100°F
- (b) 150°F
- (c) 200°F
- (d) 212°F
- (e) 250°F
- (f) 300°F
- (g) 350°F
- (h) 400°F
- (i) 500°F
- (j) 600°F
- (k) 700°F
- (l) 1000°F
- (m) 2000°F

C. State in detail all information known to you (giving the factual basis for each answer) on the following factors at the various temperatures listed below, of PVC communication wire insulation. Attach copies of all documents which comprise the factual basis for your answers to these interrogatories:

- 1. emission of toxic gases;
- 2. carbon monoxide and carbon dioxide buildup;
- 3. oxygen depletion;
- 4. heat generation, including temperature rise and convection of the products of its combustion;
- 5. loss of or impediment to visibility and disorientation;
- 6. effect of the products of its combustion on human eyes, nose, throat and respiratory system.

Please provide the above information assuming exposure of PVC communication wire insulation compounds to each of the following temperatures:

- (a) 100°F
- (b) 150°F
- (c) 200°F
- (d) 212°F
- (e) 250°F
- (f) 300°F
- (g) 350°F
- (h) 400°F
- (i) 500°F
- (j) 600°F
- (k) 700°F
- (l) 1000°F
- (m) 2000°F

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INTERROGATORY NO. 48: Describe in complete detail
and please attach copies of any and all instruction booklets,
brochures, manuals, warnings or other printed materials
distributed with or in conjunction with the sale or sales
referred to in Interrogatory No. 44 above.