

trademark.

Union Carbide purchased the Bakelite Corporation in 1939. Union Carbide manufactured phenolic resins and phenolic molding compounds under the trade name Bakelite. In addition, numerous other companies unrelated to Union Carbide made phenolic resins and /or phenolic molding compounds, including but not limited to, Durez, Plastic Engineering Co. (Plenco), GE and Reichold, none of which were associated with Union Carbide, but customers often times referred to these manufactures' products as Bakelite. Similarly, end users often referred to other companies' products made from phenolic resins or phenolic molding compounds as Bakelite. Bakelite became a generic name that has been widely used to refer to a variety of plastic or plastic-related products. Union Carbide ceased manufacturing and selling asbestos-containing phenolic molding compounds by 1975.

INTERROGATORY NO. 131: From 1940 to present, state whether Defendant and/or any predecessor or related company ever provided workers' compensation, health, accident and disability and/or life insurance coverage for its employees, and if so:

- (a) Identify each insurance carrier which provided workers' compensation, health, accident and disability and/or life insurance coverage to your employees and the dates such coverage was provided by each such carrier;
- (b) State whether such insurance carrier(s) ever conducted any dust counts or studies, industrial hygiene surveys or other tests relating to any asbestos-containing products that Defendant's employees may have been working with or around; and,
- (c) If your response to subpart (b) hereof is in the affirmative, please indicate the date of each such count, study, survey or other test and identify all documents relating thereto.

RESPONSE:

See General Objections Nos. 1-8. Union Carbide further objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide further objects 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 litigation on the grounds that such requests are 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.

See also Union Carbide's Response to Interrogatory No. 89, including all objections set forth therein.

INTERROGATORY NO. 132: Other than cases identified in Interrogatories 89, 90, 110