

DISTRICT COURT, BOULDER COUNTY, COLORADO Boulder Justice Center 1777 6 th Street P. O. Box 4249 Boulder, CO 80306	? COURT USE ONLY?
IN RE: ASBESTOS CASES Attorneys for Plaintiff: J. Conard Metcalf, \$2489 Jeffrey R. Hill, #26099 1435 Arapahoe Avenue Boulder, Colorado 80302 Telephone: 303-442-0173 Fax Number: 303-443-7677 Attorney for Defendants: Mary Price Birk, #10415 Baker & Hostetler LLP 303 E. 17 th Ave., #1100 Denver, Colorado 80203 Telephone: 303-861-0600 Fax Number: 303-861-7805	
DEFENDANT'S RESPONSE TO PLAINTIFFS' DISCOVERY TO DEFENDANT UNION CARBIDE CORPORATION (2002.06.14)	

Defendant Union Carbide Corporation ("Union Carbide") by its attorneys Baker & Hostetler LLP, responds as follows to Plaintiffs' Request for Production:

GENERAL OBJECTIONS

Union Carbide Corporation ("Union Carbide") objects to the entire set of Requests for Production on the following grounds, which are hereby incorporated by reference in Union Carbide's responses to Individual Requests below:

GENERAL OBJECTION NO. 1: Union Carbide states that trial preparation and factual investigation are ongoing. Union Carbide's responses to these Requests for Production are based on information known to Union Carbide at this time. Union Carbide reserves the right, however to make reference at the trial or at any hearing in this action to facts

and documents not identified in these responses, the existence or relevance of which is later discovered by it or its counsel. By this reservation, Union Carbide does not in any way assume a continuing responsibility to update its responses to these Requests for Production, and specifically objects to each of them to the extent that they seek to impose any such continuing obligation upon Union Carbide. To the extent the information contained herein differs in any respect from any prior responses to discovery, this response shall be deemed to update and supersede such prior responses.

GENERAL OBJECTION NO. 2: Union Carbide objects to Plaintiffs' Requests for Production in their entirety on the grounds that they are not reasonably framed in terms of the facts and subject matter of the present action, with the result that Union Carbide is called upon to speculate as to what information relevant to the present case, if any, may be deemed to fall within the scope of the Interrogatories as phrased. In addition, Union Carbide objects to these Requests for Production to the extent that they seek the production of information not relevant to any matter at issue in this litigation.

GENERAL OBJECTION NO. 3: Union Carbide objects to all Requests for Production insofar as they would require the disclosure of information protected by the attorney-client privilege or work product doctrine.

GENERAL OBJECTION NO. 4: Union Carbide acquired mineral rights to its Coalinga mine in 1958. From 1958 until late 1963 Union Carbide developed its mining and milling processes. From August, 1963 until June 30, 1985, Union Carbide mined and sold short fiber chrysotile asbestos initially as "Union Carbide Asbestos" and then under the trade name "Calidria" (some distributors marketed Calidria under other trade names). Calidria is not an "asbestos-containing product". In the beginning years, particularly 1963 to 1965, sales were relatively small and even as Union Carbide attempted to develop business, Union Carbide remained a relatively small participant with a focus, due to the unique nature of Calidria, on developing applications suitable for the unique fiber. All responses to these Requests for Production refer to Calidria asbestos only, unless otherwise stated.

GENERAL OBJECTION NO. 5: Union Carbide objects to this entire set of Requests for Production to the extent that they call for information about Union Carbide employees or premises, or policies pertaining to Union Carbide employees or premises. Inasmuch as the Plaintiffs do not allege that they or their decedents were ever employed by Union Carbide or worked at any job site controlled by Union Carbide, such information is irrelevant and immaterial to matters at issue in this case.

GENERAL OBJECTION NO. 6: Union Carbide objects to this entire set of Requests for Production to the extent that they seek information contained in documents that are available to Plaintiff's counsel in the document repository maintained by Union Carbide's counsel. The burden of determining the responses to these Requests is equally as

demanding on Plaintiff counsel as it is on Union Carbide. The burden on Union Carbide is enhanced because many of the events and circumstances that appear to be at issue took place approximately 40 years ago. With the passage of time, complete records may no longer exist, memories have faded and to go back and attempt to recreate history presents often times an insurmountable challenge and an undue burden.

Request No. 1: The education and training of UC employees concerning asbestos health hazards.

Response to Request #1: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Union Carbide has undertaken to gather existing asbestos-related documents and place them in the document repository maintained by Union Carbide's counsel ("the repository"). The repository is supplemented as additional documents are identified. Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 2: The education and training of UC employees concerning installation and removal of asbestos containing materials.

Response to Request #2: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, and is not calculated to lead to the discovery of admissible evidence. Union Carbide also objects to this Request to the extent that it calls for information about Union Carbide employees or premises. Inasmuch as the Plaintiff does not allege that they or their decedents were ever employed by Union Carbide or worked at any job site controlled by Union Carbide, such information is irrelevant and immaterial to matters at issue in this case. Subject to its objections, Union Carbide responds as follows:

To the extent responsive documents are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 3: Uses and applications for Calidria asbestos.

Response to Request #3: See General Objection Nos. 1, 2, 4 and 5. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 4: George Clayton Surveys.

Response to Request #4: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request for Production are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 5: William R. Bradley surveys.

Response to Request #5: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request for Production are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 6: McCrone laboratory.

Response to Request #6: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request for Production are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 7: U.S. Bureau of Mines.

Response to Request #7: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 8: Workers' Compensation claims against UC for pulmonary fibrosis, asbestosis, pleural thickening, pleural plaques, lung cancer and/or mesothelioma of the pleura and/or peritoneum.

Response to Request #8: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, and is not calculated to lead to the discovery of admissible evidence. Union Carbide further objects to this Request to the extent that it calls for information about Union Carbide employees or premises. Inasmuch as the Plaintiff does not allege that they or their decedents were ever employed by Union Carbide or worked at any job site controlled by Union Carbide, such information is irrelevant and immaterial to matters at issue in this case. Subject to its objections, Union Carbide responds as follows:

No such claims have been filed for employees at the Calidria mine and mill that was located at or near King City, California.

To the extent documents responsive to this Request for Production are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 9: Sales of asbestos fiber.

Response to Request #9: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 10: Purchasers of asbestos fiber.

Response to Request #10: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the documents at the document repository maintained by Union Carbide's counsel.

Request No. 11: Harrison Rhodes.

Response to Request #11: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 12: John Myers

Response to Request #12: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 13: W. C. Thurber

Response to Request #13: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 14: J. W. Rawlins

Response to Request #14: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade

the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 15: R. G. Woolery

Response to Request #15: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 16: R. E. Byrne, Jr.

Response to Request #16: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 17: T. J. Hall

Response to Request #17: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 18: D. L. Folkman

Response to Request #18: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 19: D. L. Haywood

Response to Request #19: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 20: Jim Wilkinson

Response to Request #20: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 21: Wayne Carick

Response to Request #21: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade

the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 22: John Riddle

Response to Request #22: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 23: Norm Setter

Response to Request #23: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 24: Walt Young

Response to Request #24: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 25: N. J. Setter

Response to Request #25: See Union Carbide's response to Request No. 23, including all objections set forth therein.

Request No. 26: N. L. Zutty

Response to Request #26: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 27: J. K. Corrie

Response to Request #27: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 28: W. J. Vincent

Response to Request #28: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 29: L. R. Noble

Response to Request #29: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 30: T. G. Swanson

Response to Request #30: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 31: R. J. Sexton

Response to Request #31: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 32: L. L. Bissott

Response to Request #32: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade

the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 33: B. L. Engle

Response to Request #33: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 34: G. G. Gabrielson, Jr.

Response to Request #34: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 35: Robert H. Mereness

Response to Request #35: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 36: A. G. Cranch

Response to Request #36: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 37: J. G. Marshall

Response to Request #37: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 38: W. G. Hazard

Response to Request #38: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 39: W. C. L. Hemeon

Response to Request #39: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of

admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 40 Christopher Wagner

Response to Request #40: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 41: Asbestos SPU Committee

Response to Request #41: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 42: Calidria product literature, 1960-1987 (by way of example, brochures, advertisements, technical data sheets, material safety data sheets, Thomas Register materials)

Response to Request #42: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Union Carbide did not sell Calidria before 1963 or after June, 1985. Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 43: Results of air sampling for dust at plants, facilities, locations where Calidria was being shipped, handled, stored, prepared and/or used

Response to Request #43: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 44: Strategic Planning, Asbestos

Response to Request #44: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 45: Drilling mud.

Response to Request #45: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 46: Tape Joint and/or Tape Joint Compound

Response to Request #46: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 47: Ad Hoc Committee on Construction

Response to Request #47: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 48: Lab Program – Asbestos

Response to Request #48: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 49: General Occupational Health Committee

Response to Request #49: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 50: General Safety Committee

Response to Request #50: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request for Production are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 51: Annual Reports, 1957-1990

Response to Request #51: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Union Carbide will provide copies of its last five annual reports at a mutually agreeable time and place.

Request No. 52: Litigation involving plaintiff Roderman, including but not limited to all pleadings and all written discovery to UC and responses to UC to that written discovery in Roderman.

Response to Request #52: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide further objects to the extent it seeks information protected by the attorney-client and/or work product doctrine. Moreover, the information responsive to this Request is in the public domain, and equally available to plaintiffs.

Request No. 53: Lawsuits filed against UC by people claiming injury or disease caused in whole or in part by exposure to asbestos and/or silica.

Response to Request #53: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the information responsive to this Request is in the public domain, and equally available to plaintiffs.

Request No. 54: Amounts paid to settle each lawsuit filed against UC by people claiming injury, disease or death claimed to have been caused in whole or in part by asbestos and/or silica.

Response to Request #54: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide further objects to the extent it seeks information protected by the attorney-client and/or work product doctrine.

Request No. 55: Estimates, calculations, determinations, and/or projections and the basis for same, for how much money UC would pay in settlement or judgment for each case alleging injury due to

- Any asbestos related disease claim.
- An asbestos related disease claim for asbestosis

- An asbestos related disease claim for mesothelioma
- An asbestos related disease claim for lung cancer.
- An asbestos related disease claim for pleural plaques or pleural scarring.

Response to Request #55: See General Objection Nos. 1 – 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide further objects to the extent it seeks information protected by the attorney-client and/or work product doctrine.

Request No. 56: Contracts regarding the extraction of asbestos at UC's King City, California, facility.

Response to Request #56: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, and ambiguous as to the term "extraction" and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request for Production are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 57: Arthur Vorwald

Response to Request #57: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 58: Gerrit Schepers

Response to Request #58: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 59: Jon Konzen

Response to Request #59: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 60: Lee Grant

Response to Request #60: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 61: Emory Houghton

Response to Request #61: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 62: Ed Fenner

Response to Request #62: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 63: Hugh M. Jackson

Response to Request #63: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 64: Kenneth W. Smith

Response to Request #64: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 65: Ian Sayers.

Response to Request #65: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of

admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 66: Charles Durnehl.

Response to Request #66: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 67: Hilton Lewinsohn

Response to Request #67: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 68: Richard J. Sexton

Response to Request #68: See Union Carbide's response to Request No. 31, including all objections set forth therein.

Request No. 69: W. C. Thurber

Response to Request #69: See Union Carbide's response to Request No. 13, including all objections set forth therein.

Request No. 70: William F. Long

Response to Request #70: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 71: R. J. Klotzbach

Response to Request #71: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 72: R. F. Kelly

Response to Request #72: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 73: James Bright

Response to Request #73: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 74: Mearl Stanton.

Response to Request #74: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 75: Leroy Balzer.

Response to Request #75: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 76: Clark Cooper

Response to Request #76: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide counsel.

Request No. 77: Irving Selikoff

Response to Request #77: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 78: Hans Weill

Response to Request #78: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 79: George Wright.

Response to Request #79: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 80: W. H. Winans

Response to Request #80: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade

the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 81: Leroy Gardner

Response to Request #81: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 82: Anthony Lanza

Response to Request #82: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 83: Saranac Lake Laboratory.

Response to Request #83: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 84: Trudeau Foundation.

Response to Request #84: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide counsel.

Request No. 85: Metropolitan Life Insurance Company

Response to Request #85: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide counsel.

Request No. 86: Engene Pendergrass

Response to Request #86: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 87: Henry Pancoast

Response to Request #87: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 88: A. W. Sherwood

Response to Request #88: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 89: American Refractory Institute

Response to Request #89: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 90: Roger Hitchins

Response to Request #90: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 91: Leonard Bristol

Response to Request #91: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 92: Medical Research Council

Response to Request #92: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 93: Asbestos International Association.

Response to Request #93: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 94: Asbestos Information Association, North America

Response to Request #94: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 95: Paul McDaniel

Response to Request #95: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 96: R. W. Rebholz

Response to Request #96: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 97: Howard Stephens

Response to Request #97: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 98: W. C. Young

Response to Request #98: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 99: Claude Osborn

Response to Request #99: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent that documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 100: Bob Jones

Response to Request #100: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent that documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 101: K. S. Lane

Response to Request #101: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 102: D. L. Haywood

Response to Request #102: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent that documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 103: Charles P. Carpenter

Response to Request #103: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 104: A. E. Puhfal

Response to Request #104: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 105: E. J. Kleber

Response to Request #105: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 106: W. C. Young

Response to Request #106: See Union Carbide's response to Request No. 98, including all objections set forth therein.

Request No. 107: W. C. Kuryla

Response to Request #107: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 108: J. A. Riddle

Response to Request #108: See Union Carbide's response to Request No. 22, including all objections set forth therein.

Request No. 109: T. A. Dougherty

Response to Request #109: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent that documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 110: E. W. Shortridge

Response to Request #110: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of

admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent that documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 111: E. A. Piersall

Response to Request #111: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 112: W. J. McConnell

Response to Request #112: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent that documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 113: Thorne Auchter

Response to Request #113: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent that documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 114: Union Carbide Contractor Safety Rules

Response to Request #114: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 115: Aetna Safety Engineering Department

Response to Request #115: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 116: T. W. Nale

Response to Request #116: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 117: H. W. Fawcett.

Response to Request #117: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade

the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent that documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 118: Elkem Management, Inc.

Response to Request #118: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 119: Francis King

Response to Request #119: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent that documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 120: Samuel Heyman

Response to Request #120: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified. Subject to its objections, Union Carbide responds as follows:

To the extent that documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 121: Garlock

Response to Request #121: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 122: Conwed Corp.

Response to Request #122: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 123: Carnegie Mellon University

Response to Request #123: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 124: Mellon Institute

Response to Request #124: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 125: Air Hygiene Foundation

Response to Request #125: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad,

unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 126: Industrial Hygiene Foundation

Response to Request #126: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 127: Industrial Health Foundation

Response to Request #127: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 128: Kanawha Industrial Emergency Planning Council

Response to Request #128: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 129: Manufacturing Chemists Association.

Response to Request #129: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad,

unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 130: Chemical Manufacturers Association.

Response to Request #130: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 131: National Institute for Chemical Studies (NICS)

Response to Request #131: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 132: West Virginia Manufacturers Association.

Response to Request #132: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 133: Toxic Substances Control Act (TSCA).

Response to Request #133: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad,

unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, they are located in the document repository maintained by Union Carbide's counsel.

Request No. 134: Labeling of materials for the purpose of disclosing the potential for injury, disease or other harm to those coming into contact with those materials.

Response to Request #134: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague and ambiguous as to the term "materials" and is not calculated to lead to the discovery of admissible evidence.

Request No. 135: UC Labeling Committee

Response to Request #135: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 136: Hawk's Nest/Gaullly Bridge litigation

Response to Request #136: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, seeks attorney-client and work-product materials, and is not calculated to lead to the discovery of admissible evidence.

Request No. 137: Inquiries concerning health aspects of Calidria asbestos and/or asbestos in general.

Response to Request #137: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 138: Hazards of products competitive to Calidria asbestos and/or asbestos in general.

Response to Request #138: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 139: Photographs of palletized Calidria.

Response to Request #139: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 140: John Craighead, M.D.

Response to Request #140: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified.

Request No. 141: Brooke Mossman, Ph.D.

Response to Request #141: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Production of certain responsive documents might also invade the privacy interests of the person identified.

Request No. 142: All and any correspondence and communication between you and Johns Manville Corporation, Johns Manville Sales Corporation, Johns Manville Products Corporation and any officer, manager, employee or agent of those corporations.

Response to Request #142: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad,

unduly burdensome and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent documents responsive to this Request are in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 143: Tests, studies, actions taken to learn the nature and extent of potential harm from exposure to Calidria asbestos prior to UC's selling Calidria asbestos to others.

Response to Request #143: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide further objects to this Request for Production on the grounds that it is vague and ambiguous. It is not clear whether this Request for Production relates only to studies performed prior to Union Carbide's ever selling Calidria asbestos or more broadly to studies performed throughout the period Union Carbide sold Calidria asbestos. It is also not clear whether this Request for Production requests information only regarding studies performed by or on behalf of Union Carbide or regarding any study that relates to the health effects of Calidria asbestos. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 144: Any and all tests performed by you or at your request or direction, to determine the amount of total dust and the amount of asbestos dust released from Calidria when used, handled, and/or manipulated.

Response to Request #144: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 145: The existence, location and contents of any document repository created by UC in connection with litigation related to claims of injury, disease or other harm caused in whole or in part by exposure to asbestos and/or silica.

Response to Request #145: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad,

unduly burdensome, vague, ambiguous, seeks attorney-client and work-product materials, and is not calculated to lead to the discovery of admissible evidence. Union Carbide further objects to this Request to the extent it seeks information protected by attorney-client and/or work product doctrine. Subject to its objections, Union Carbide responds as follows:

Union Carbide has undertaken to gather existing asbestos-related documents and place them in the document repository maintained by Union Carbide's counsel ("the repository"). The repository is supplemented as additional documents are identified. Documents responsive to this Request, and in the possession of Union Carbide, are located in the document repository maintained by Union Carbide's counsel.

Request No. 146: Depositions that have been taken of all the current and/or former UC employees contained on the list marked as Exhibit A, attached hereto.

Response to Request #146: See General Objection Nos. 1 - 6. Union Carbide further objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and is not calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

To the extent that transcripts responsive to this Request are in the possession of Union Carbide, they will be made available for inspection and copying.

DATED this ____ day of August, 2002.

AS TO OBJECTIONS AND DEFENSES:

BAKER & HOSTETLER LLP

Duly executed signature on file at the office of Baker & Hostetler LLP

By: _____

Mary Price Birk, No. 10415

Ronald L. Hellbusch, No. 26094

Susan R. Hahn, No. 27344

ATTORNEYS FOR DEFENDANT UNION
CARBIDE CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on this ____ day of August, 2002, I served a true and correct copy of above and foregoing **DEFENDANTS' RESPONSE TO PLAINTIFFS' DISCOVERY TO DEFENDANT UNION CARBIDE CORPORATION (2002.06.14)** via electronically via JusticeLink to:

J. Conard Metcalf, Esq.
Jeffrey R. Hill, Esq.
Trine & Metcalf, P.C.
1435 Arapahoe Avenue
Boulder, CO 80302

*Duly executed signature on file at the office of
Baker & Hostetler LLP*

VERIFICATION

STATE OF VERMONT)
) ss:
COUNTY OF LAMOILLE)

EDWARD W. DeBOR, being duly sworn, deposes and says: that he is Union Carbide Corporation's Assistant Manager, Vermont Records; that over the past years, he participated in collecting Union Carbide's asbestos-related documents for inclusion in the asbestos-related Document Repository maintained in the offices of counsel for Union Carbide; that no single employee or former employee of Union Carbide (including deponent) has knowledge or information regarding all of the information set forth in the attached discovery responses; that the attached responses to Plaintiffs' Requests for Production were assembled and prepared by counsel for Union Carbide based upon the documents contained in the Document Repository and upon information obtained by counsel from current and former employees of Union Carbide.

Edward W. DeBor
Assistant Manager, Vermont Records

Sworn to before me this ____ day of
_____, 2002

Notary Public