

installed, inform any purchaser or user of said products that such products could cause cancer, asbestosis, and/or other serious diseases?

RESPONSE:

See Union Carbide's Responses to Interrogatory Nos. 63, 64, and 79, including all objections set forth therein.

INTERROGATORY NO. 89: Did Defendant, any predecessor or any related company, or any workers' compensation insurance carrier thereof, ever have any claims for lung diseases or death from lung disease, whether directly or indirectly attributed to asbestosis, mesothelioma, lung cancer, or exposure to asbestos-containing products?

RESPONSE:

See General Objections Nos. 1-8. Union Carbide objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead the discovery of admissible evidence. Union Carbide further objects to this Interrogatory to the extent that it calls for information about Union Carbide employees or premises, or policies pertaining to Union Carbide employees or premises that are unrelated to the claims in this litigation on the grounds that such requests are overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide further objects to this Interrogatory on the grounds that it seeks information that is equally available to Plaintiffs in the public domain. Subject to its objections, Union Carbide responds as follows:

Union Carbide is unaware of any worker's compensation claims for asbestos-related disease from workers at the Calidria mine and mill operated by Union Carbide. Union Carbide is unaware of any worker's compensation claims for asbestos-related disease from workers at Union Carbide's Boundbrook, New Jersey facility prior to 1975 when Union Carbide ceased manufacturing asbestos-containing phenolic molding compounds.

INTERROGATORY NO. 90: If your answer to Interrogatory No. 89 is "Yes," please provide the following information for each and every employee of the defendant, predecessor or related company with such claim. If the claimant was a non-employee, please provide the information for the first 100 cases of which the defendant had notice.

- (a) Identify the claimant;
- (b) Identify the entity against which the claim was filed;
- (c) State the date upon which the claim was filed;
- (d) List the location(s) at which claimant was exposed to asbestos;
- (e) Identify each and every board, administrative body, commission or court which handled or reviewed said claim and state the style and cause number applicable to said claim before each such body;