

**ANSWER:**

See General Objection No. 4. Union Carbide further objects to this Interrogatory on the grounds it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

No. See Union Carbide's response to Interrogatory No. 3.

**INTERROGATORY NO. 17:**

Did you or any of your predecessors, successors, or subsidiaries have any distributors or sales representatives of asbestos products in the States of Alabama, Florida, Mississippi, Oregon, Washington, Georgia, Tennessee, Arkansas, Texas and Virginia? if so, state:

- (a) The name and address of each such distributor or sales representatives.
- (b) The years in which such company or person distributed, marketed, or sold your products.
- (c) What products were distributed, marketed, or sold in what years.

**ANSWER:**

See general objection no. 4. Union Carbide further objects to this Interrogatory on the grounds it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Approximately three-quarters of Calidria sales were made directly by Union Carbide. Distributors accounted for the remaining approximate 25% of all Calidria sales. Union Carbide, however, no longer mines or sells Calidria and thus no longer maintains Calidria distributors. The following is a list of former Calidria distributors which Union Carbide has been able to identify:

**Presently Known Former Calidria Distributors (1963-1985)**

- 1) Allied Resin Corporation
- 2) American Industrial Chemical Corporation
- 3) Bouffard Associates
- 4) A.T. Callas Company
- 5) D. & F. Distributing, Inc.
- 6) Harrisons & Crosfield (Canada)

- 7) Harrisons & Crosfield (Pacific)
- 8) Lenape Chemicals, Inc.
- 9) Technical Petroleum Company
- 10) Technical Products, Inc.
- 11) Montello, Inc.
- 12) Harwick Chemical Corp.
- 13) Plastex, Inc.
- 14) Union Carbide International
- 15) Western Chemical & Manufacturing Company
- 16) McKesson Chemicals, Inc.
- 17) Apperson Chemicals, Inc.
- 18) Amsco Division - Union Oil Company of Calif.
- 19) Hamblet & Hayes Co.
- 20) Marco Chemical Division - W. R. Grace & Company
- 21) Wonder State Industries
- 22) The Permutit Co., Inc.
- 23) Van Waters and Rogers
- 24) Ambrosia Industrial, Inc.
- 25) Southern Fiberglas Supply

The following may have been distributors in the states of Alabama, Florida, Mississippi, Oregon, Washington, Georgia, Arkansas, Texas and Virginia:

D & F Distributing, Inc.  
Harrisons & Crosfield (Pacific)  
Lenape Chemicals, Inc.  
Montello, Inc.

**INTERROGATORY NO. 18:**

List each employee (including any physicians and/or hygienists) who has acted in a medical advisory capacity to your company at any time during the past 40 years, including, but not limited to, physicians and industrial hygienists, and the current address, telephone number and job title of each of those individuals and who has, had or may have had any knowledge regarding the hazards of asbestos.

**ANSWER:**

See general objection no. 4. Union Carbide further objections to this Interrogatory on the grounds it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide objects to this interrogatory as vague and ambiguous. Subject to its objections, Union Carbide responds as follows:

**DEFENDANT'S SUPPLEMENTAL RESPONSES TO PLAINTIFFS' MASTER INTERROGATORIES**

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