

RESPONSE:

See General Objection Nos. 1-8. Union Carbide further objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. Subject to its objections Union Carbide responds as follows:

Union Carbide's Responses to Interrogatory Nos. 63 and 84.

To the extent that additional information responsive to this Interrogatory is in the possession of Union Carbide, this information is located in the repositories maintained by Union Carbide's counsel.

INTERROGATORY NO. 86: Did Defendant or any predecessor entity perform, direct to be performed, finance in whole or in part, sponsor in whole or in part or receive the results of, any studies or tests concerning the relationship between asbestos exposure and asbestosis, cancer and/or mesothelioma?

RESPONSE:

See General Objection Nos. 1-8. Union Carbide further objects to this Interrogatory on the ground that it is overly broad. Subject to its objections, Union Carbide responds as follows:

There are thousands of publicly available articles and other literature that relate to the health effects of asbestos and upon which experts identified by Union Carbide may rely in rendering an opinion on health effects of exposure to Calidria asbestos. The following are a few examples of recent articles that address the health effects of Calidria specifically (which also reference other studies done on Calidria):

1. Ilgren, E., et al., Coalinga-Fibre – A Short, Amphibole-Free Chrysotile: Part 1: Evidence For A Lack Of Fibrogenic Activity, Indoor Built Environ., 6:264-176 (1997);
2. Ilgren, E., et al., Coalinga-Fibre – A Short, Amphibole-Free Chrysotile: Part 2: Evidence For A Lack Of Tumourigenic Activity, Indoor Built Environ., 7:18-31 (1997); and ,
3. Ilgren, E., et al., Coalinga-Fibre – A Short, Amphibole-Free Chrysotile: Part 3: Lack of Biopersistence, Indoor Built Environ., 7:98-109 (1998).

In addition to studies that relate to the effects of inhalation of Calidria at high doses, there are also studies that relate to the effects of injecting Calidria into lab animals under experimental conditions. These include two studies of Calidria asbestos that were made by the Mellon Institute on behalf of Union Carbide:

1. The first study, conducted in 1966, was entitled "The Fibrogenic Potential of asbestos Products - Via Intraperitoneal Injection In Guinea Pigs, Rats and Rabbits and by the Intratracheal Route in the Rat." A copy of the study's report is located in the repositories maintained by Union Carbide's counsel.