

See Union Carbide's Response to Interrogatory No. 64, including all objections set forth therein.

INTERROGATORY NO. 71: If your answer to Interrogatory No. 70 is "Yes," identify each and every product upon which such a warning was placed and for each such product identified:

- (a) State, verbatim, each and every warning which ever appeared on said product;
- (b) State the size, color and location of each such warning and describe the manner in which it was placed upon the product;
- (c) State the dates on which each such warning first and last appeared in said product; and,
- (d) Identify any and all documents referring to, relating to or reflecting the placing of any warning directly upon said products, including, but not limited to, decisions not to place such a warning.

RESPONSE:

See Union Carbide's Response to Interrogatory No. 64, including all objections set forth therein.

INTERROGATORY NO. 72: Did any warning of any type concerning the products listed in response to Interrogatory Nos. 19 and 42 ever appear in any sales literature or other materials distributed or provided by Defendant, any predecessor or any related company, to the purchasers, consumers and/or users of such products?

RESPONSE:

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

In addition, Union Carbide provided its customers, many of whom had years of experience in handling asbestos and other minerals and chemicals, with recommendations on how to minimize asbestos dust. Union Carbide prepared booklets and other written information for its customers containing information related to specific applications. These written materials contained specific information on asbestos health hazard and safety issues, regulatory requirements, air monitoring results and other pertinent items. In 1964, Union Carbide prepared an Asbestos Toxicology Report, which provided comprehensive information about the potential health risks of asbestos. This Asbestos Toxicology Report was updated with the 1969 Asbestos Toxicology Report and the Mid-1970 and 1972 Toxicology summaries. The initial report and its updates were prepared to keep customers current with evolving medical knowledge about health and safety issues relating to asbestos, and were distributed by mail and in face-to-face meetings to many of Union Carbide's asbestos customers, many of whom were sophisticated companies