

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. Subject to its objections, Union Carbide responds as follows:

See Union Carbide's Response to Interrogatory No. 117, including all objections set forth therein.

INTERROGATORY NO. 119: With respect to your answers to Interrogatory numbers 116, 117, and 118, identify any and all documents, including, but not limited to, transcripts or notes of testimony, referring to, relating to or reflecting the testimony of such expert witnesses or employees.

RESPONSE:

See General Objections Nos. 1 – 8. Union Carbide objects to this Interrogatory to the extent it seeks information that is in the public domain. Union Carbide further objects to the term "notes of testimony" as undefined and vague. Subject to its objections, Union Carbide responds as follows:

See Union Carbide's Response to Interrogatory No. 117, including all objections set forth therein.

INTERROGATORY NO. 120: Has Defendant, any predecessor or any related company, ever been cited, warned, fined, sanctioned or otherwise officially written up for, any violation of a federal, state or local statute, law, rule, ordinance, code, administrative order, executive order, or the like, by any federal, state or local governmental entity, which violation concerned asbestos in any way?

RESPONSE:

See General Objections Nos. 1-8. Union Carbide further objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, vague and ambiguous and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide 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. Subject to its objections, Union Carbide responds as follows:

To the extent that 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.