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PLAINTIFF'S EXHIBIT

UC-5184

Attorneys for Defendant
UNION CARBIDE CORPORATION
(formerly known as Union Carbide
Chemicals and Plastics Company, Inc.)

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

KLAUS BRAUCH and SUSAN BRAUCH,

Plaintiffs,

vs.

BONDEX INTERNATIONAL, INC., et al.,

Defendants.

CASE NO. BC 258492

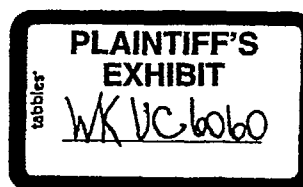
**UNION CARBIDE CORPORATION'S
AMENDED RESPONSES TO
PLAINTIFF'S REQUEST FOR
ADMISSIONS (SET ONE)**

PROPOUNDING PARTY: PLAINTIFF KLAUS BRAUCH

RESPONDING PARTY: UNION CARBIDE CORPORATION (formerly known as Union
Carbide Chemicals and Plastics Company, Inc.)

SET NO.: ONE

Defendant Union Carbide Corporation provides the following Amended responses to
plaintiffs' Request for Admissions, set one, after locating further documentation.



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GENERAL OBJECTION NO. 1:

GENERAL OBJECTION NO. 2:

GENERAL OBJECTION NO. 3:

GENERAL OBJECTION NO. 4:

- 2 -

1 products was encapsulated by or embedded in other material and on the grounds that the
2 plaintiff has made no allegation of exposure to those products. All responses to these Requests
3 for Admissions refer to Calidria asbestos only, unless otherwise stated.

4 **GENERAL OBJECTION NO. 5:**

5 Union Carbide objects to this entire set of Requests for Admissions to the extent that
6 they call for information about Union Carbide employees or premises, or policies pertaining to
7 Union Carbide employees or premises. Inasmuch as the plaintiffs do not allege that they or their
8 decedents were ever employed by Union Carbide or worked at any job site controlled by Union
9 Carbide, such information is irrelevant and immaterial to matters at issue in this case. Any
10 pertinent information which the employee or premises information can be said to reflect can be
11 requested directly without requesting the irrelevant and immaterial information or
12 documentation about employees or premises.

13 **GENERAL OBJECTION NO. 6:**

14 Union Carbide objects to the entire set of Requests for Admissions to the extent that they
15 call for information beyond this plaintiff's claims about asbestos-containing products to which
16 Union Carbide allegedly supplied raw asbestos fiber contained in the Case Report filed pursuant
17 to the Los Angeles Asbestos First Amended General Order No. 29. Union Carbide therefore
18 limits its Responses to the Requests for Admissions to the claims regarding Union Carbide
19 found in plaintiff's Case Report which was served on December 20, 2001. Specifically, these
20 Responses are limited to plaintiff's contention that Union Carbide Corporation was a supplier of
21 raw asbestos fiber to United States Gypsum Company and National Gypsum Company for use
22 in their asbestos-containing joint compound products to which plaintiff claims he was exposed
23 in 1968. As such, these Responses are limited to the relevant timeframe of the plaintiff's
24 claims, in particular prior to and including 1968.

25 **RESPONSES TO REQUESTS FOR ADMISSION**

26 **REQUEST FOR ADMISSION NO. 1:**

27 Admit that on You mined raw asbestos.
28

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

2 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
3 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
4 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
5 Admitted that for a period of time Union Carbide mined a unique, short fiber chrysotile asbestos
6 ore called Calidria from the California New Idria deposit.

7 **REQUEST FOR ADMISSION NO. 2:**

8 Admit that You mined raw asbestos from a mine at King City, California.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

10 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
11 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
12 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
13 Denied that Union Carbide's mine was in King City, CA. The mine was approximately 50
14 miles from King City.

15 **REQUEST FOR ADMISSION NO. 3:**

16 Admit that You sold raw asbestos between 1964 and 1985.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

18 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
19 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
20 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
21 Admitted that Union Carbide sold during that time frame raw asbestos, in pelletized and fibrous
22 form. The asbestos was not sold to the general public or to "end users." It was sold to
23 manufacturers for use in their products and production processes.

24 **REQUEST FOR ADMISSION NO. 4:**

25 Admit that You sold raw asbestos mined from King City, California between 1964 and
26 1985.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

2 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
3 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
4 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
5 Admitted in part. Union Carbide sold asbestos milled in its King City, CA mill between 1964
6 and 1985. The asbestos was mined approximately 50 miles away.

7 **REQUEST FOR ADMISSION NO. 5:**

8 Admit that You sold raw asbestos to Georgia-Pacific Corporation.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

10 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
11 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
12 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
13 Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of
14 exposure, namely, prior to and including September 1968.

15 **REQUEST FOR ADMISSION NO. 6:**

16 Admit that you sold raw asbestos fiber to Georgia-Pacific Corporation in 1968.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

18 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
19 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
20 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
21 Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of
22 exposure, namely, prior to and including September 1968.

23 **REQUEST FOR ADMISSION NO. 7:**

24 Admit that You sold raw asbestos fiber to Georgia-Pacific Corporation for use in
25 Georgia-Pacific Corporation joint compounds.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

27 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
28 Request on the grounds that it is overly broad and not reasonably calculated to lead to the

1 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
2 Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of
3 exposure, namely, prior to and including September 1968.

4 **REQUEST FOR ADMISSION NO. 8:**

5 Admit that You sold raw asbestos fiber to United States Gypsum Company.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

7 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
8 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
9 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
10 Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of
11 exposure, namely, prior to and including September 1968.

12 **REQUEST FOR ADMISSION NO. 9:**

13 Admit that You sold raw asbestos fiber to United States Gypsum Company in 1968.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

15 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
16 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
17 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
18 Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of
19 exposure, namely, prior to and including September 1968.

20 **REQUEST FOR ADMISSION NO. 10:**

21 Admit that You sold raw asbestos fiber to United States Gypsum Company for use in
22 United States Gypsum Company joint compounds.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

24 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
25 Request on the grounds that it is overly broad, vague, ambiguous, and not reasonably calculated
26 to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide
27 responds as follows: Denied for use in joint compounds as to the relevant timeframe of this
28 plaintiff's claims of exposure, namely, prior to and including September 1968.

1 **REQUEST FOR ADMISSION NO. 11:**

2 Admit that You sold raw asbestos fiber to United States Gypsum Company for use in
3 USG joint compound.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

5 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
6 Request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated
7 to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide
8 responds as follows: Denied for use in joint compounds as to the relevant timeframe of this
9 plaintiff's claims of exposure, namely, prior to and including September 1968.

10 **REQUEST FOR ADMISSION NO. 12:**

11 Admit that You sold raw asbestos fiber to United States Gypsum Company for use in
12 Durabond joint compound.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

14 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
15 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
16 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
17 Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of
18 exposure, namely, prior to and including September 1968.

19 **REQUEST FOR ADMISSION NO. 13:**

20 Admit that You sold raw asbestos fiber to Proko Industries, Inc.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

22 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
23 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
24 discovery of admissible evidence. Union Carbide additionally objects to this Request on the
25 grounds of relevance in that it seeks information about a product manufacturer to whose
26 products plaintiff never claimed exposure. Subject to its objections, Union Carbide responds as
27 follows: Denied as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior
28 to and including 1968.

1 **REQUEST FOR ADMISSION NO. 14:**

2 Admit that You sold raw asbestos fiber to Proko Industries for use in Proko Industries
3 joint compounds.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

5 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
6 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
7 discovery of admissible evidence. Union Carbide additionally objects to this Request on the
8 grounds of relevance in that it seeks information about a product manufacturer to whose
9 products plaintiff never claimed exposure. Subject to its objections, Union Carbide responds as
10 follows: Denied as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior
11 to and including 1968.

12 **REQUEST FOR ADMISSION NO. 15:**

13 Admit that You sold raw asbestos fiber to National Gypsum Company.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

15 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
16 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
17 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
18 Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of
19 exposure, namely, prior to and including September 1968.

20 **REQUEST FOR ADMISSION NO. 16:**

21 Admit that You sold raw asbestos fiber to National Gypsum Company in 1968.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

23 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
24 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
25 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
26 Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of
27 exposure, namely, prior to and including September 1968.

1 **REQUEST FOR ADMISSION NO. 17:**

2 Admit that You sold raw asbestos fiber to National Gypsum Company for use in
3 National Gypsum Company joint compounds.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

5 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
6 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
7 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
8 Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of
9 exposure, namely, prior to and including September 1968.

10 **REQUEST FOR ADMISSION NO. 18:**

11 Admit that You sold raw asbestos fiber to National Gypsum Company for use in Gold
12 bond joint compound.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

14 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
15 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
16 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
17 Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of
18 exposure, namely, prior to and including September 1968.

19 **REQUEST FOR ADMISSION NO. 19:**

20 Admit that You sold raw asbestos fiber to Kelly-Moore Paint Company, Inc.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

22 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
23 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
24 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
25 Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of
26 exposure, namely, prior to and including September 1968.

27 **REQUEST FOR ADMISSION NO. 20:**

28 Admit that You sold raw asbestos fiber to Kelly-Moore Paint Company, Inc. in 1968.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

2 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
3 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
4 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
5 Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of
6 exposure, namely, prior to and including September 1968.

7 **REQUEST FOR ADMISSION NO. 21:**

8 Admit that You sold raw asbestos fiber to Kelly-Moore Paint Company, Inc. for use in
9 Kelly-Moore Paint Company, Inc. joint compounds.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

11 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
12 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
13 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
14 Denied for use in joint compounds as to the relevant timeframe of this plaintiff's claims of
15 exposure, namely, prior to and including September 1968.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that You sold raw asbestos fiber to Kelly-Moore Paint Company, Inc. for use in
18 PACO joint compound.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

20 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
21 Request on the grounds that it is overly broad, vague, ambiguous, and not reasonably calculated
22 to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide
23 responds as follows: Denied for use in joint compounds as to the relevant timeframe of this
24 plaintiff's claims of exposure, namely, prior to and including September 1968.

25 **REQUEST FOR ADMISSION NO. 23:**

26 Admit You sold, raw asbestos fiber to Kelly-Moore Paint Company, Inc. for use in
27 PACO quick set joint compound.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

2 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
3 Request on the grounds that it is overly broad, vague, ambiguous, and not reasonably calculated
4 to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide
5 responds as follows: Denied for use in joint compounds as to the relevant timeframe of this
6 plaintiff's claims of exposure, namely, prior to and including September 1968.

7 **REQUEST FOR ADMISSION NO. 24:**

8 Admit that, from September 1970 to May 1977, all joint compounds manufactured by
9 Georgia-Pacific Corporation contained raw asbestos fiber supplied by You.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

11 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
12 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
13 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
14 Denied.

15 **REQUEST FOR ADMISSION NO. 25:**

16 Admit that the trade name of the raw asbestos fiber that you sold between 1964 and 1985
17 was known as Calidria.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

19 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
20 Request on the grounds that it is overly broad, vague, ambiguous, and not reasonably calculated
21 to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide
22 responds as follows: Admitted in part. Union Carbide sold its asbestos initially as "Union
23 Carbide Asbestos" and then under the name "Calidria". Union Carbide's asbestos was given
24 other trade names by some distributors.

25 **REQUEST FOR ADMISSION NO. 26:**

26 Admit that the raw asbestos fiber you sold between 1964 and 1985 was referred to by
27 You as a short fiber Chrysotile.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

2 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
3 Request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated
4 to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide
5 responds as follows: Admitted. Calidria consisted of raw chrysotile asbestos in a unique short-
6 fiber formulation which Union Carbide mined near King City, California.

7 **REQUEST FOR ADMISSION NO. 27:**

8 Admit that You represented to your raw asbestos fiber customers that your raw asbestos
9 fiber was safer than other forms of asbestos fiber.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

11 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
12 Request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated
13 to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide
14 responds as follows: Denied.

15 Union Carbide advised its customers to take precautions applicable to the use of any
16 asbestos fibers. See Calidria's brochure (1968) a true and correct copy of which is attached
17 hereto as Exhibit "A".

18 Calidria was mined from a deposit which consisted of a unique form of chrysotile. As a
19 result of its unique properties, Calidria could not pose the dangers which might be created by
20 asbestos from other deposits. Those properties include the following: Calidria's short fiber
21 length (shorter than any other known chrysotile); the Calidria deposit's lack of tremolite
22 contamination; Calidria's quick dissolution due to the "weak" fibril structure; and its width and
23 shape. Many of Union Carbide's expert witnesses can testify as to the unique properties of the
24 Calidria fiber and resulting innocuous biological impact of Calidria.

25 In spite of the unique, innocuous nature of the Calidria fiber, Union Carbide has long
26 recognized the desirability of avoiding excessive exposure to dust from any source. Union
27 Carbide took steps to enable customers to minimize or avoid the creation of and exposure to
28 dust from Calidria.

1 During the early days of Union Carbide's Calidria business, medical and industrial health
2 officials at Union Carbide issued asbestos toxicology reports which were distributed to sales and
3 other appropriate personnel. Warning labels were added to Calidria packages in 1968 and
4 toxicological information first appeared in sales literature in that year. Material Safety Data
5 Sheets were mailed to Calidria customers beginning in 1972. AIA/NA information pamphlets
6 were made available to customers starting in 1972 and were mailed to customers beginning in
7 1977 at the latest.

8 The health and safety literature made available and disseminated by Union Carbide to its
9 Calidria customers warned of possible serious adverse health effects associated with the
10 excessive inhalation of asbestos fiber, advised customers on ways to control or avoid such
11 hazards, including the use of respirators as a way to avoid the hazards. In addition to the
12 dissemination of health and safety information, Union Carbide took active steps to help insure
13 that Calidria was handled and used in a clean and safe manner and environment: Union Carbide
14 employed shrink-wrap, tight-fitting packaging to prevent leakage, spillage, or dust emission
15 during the shipment of Calidria. Union Carbide also developed pelletized forms of Calidria
16 which would reduce dust emission. In 1972, Union Carbide offered to take dust counts of the
17 premises of Calidria customers in order to help them maintain a safe working environment, a
18 service which many Calidria customers utilized (Calidria was not sold to the general public or
19 other "end-users", but rather was marketed only to manufacturers or producers who used
20 Calidria in their products or production processes). Dr. Harrison Rhodes, an industrial
21 hygienist, supervised Union Carbide's dust monitoring program.

22 **REQUEST FOR ADMISSION NO. 28:**

23 Admit that You represented to Georgia-Pacific Corporation that your raw asbestos fiber
24 was safer than other types of raw asbestos fiber.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

26 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
27 Request on the grounds that it is overly broad, vague, ambiguous and not reasonably calculated
28 to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide

1 responds as follows: See Response to Request for Admission No. 27, including all objections
2 asserted therein.

3 **REQUEST FOR ADMISSION NO. 29:**

4 Admit that You advised Georgia-Pacific Corporation that your raw asbestos fiber was
5 safer than other types of raw asbestos fiber.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

7 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
8 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
9 discovery of admissible evidence. See Union Carbide's Response to Request for Admission No.
10 27, including all objections asserted therein.

11 **REQUEST FOR ADMISSION NO. 30:**

12 Admit that You represented to United States Gypsum Company that your asbestos fiber
13 was safer than other types of raw asbestos fiber.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

15 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
16 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
17 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
18 See Union Carbide's Response to Request for Admission No. 27, including all objections
19 asserted therein.

20 **REQUEST FOR ADMISSION NO. 31:**

21 Admit that You advised United States Gypsum Company that your asbestos fiber was
22 safer than other types of raw asbestos fiber.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 31:**

24 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
25 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
26 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
27 See Union Carbide's Response to Request for Admission No. 27, including all objections
28 asserted therein.

1 **REQUEST FOR ADMISSION NO. 32:**

2 Admit that You represented to Proko Industries that your raw asbestos fiber was safer
3 than other types of raw asbestos fiber.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 32:**

5 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
6 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
7 discovery of admissible evidence. Union Carbide additionally objects to this Request on the
8 grounds of relevance in that it seeks information about a product manufacturer to whose
9 products plaintiff never claimed exposure. Subject to its objections, Union Carbide responds as
10 follows: Denied as to the relevant timeframe of this plaintiff's claims of exposure, namely,
11 prior to and including 1968. See also Union Carbide's Response to Request for Admission No.
12 27, including all objections asserted therein.

13 **REQUEST FOR ADMISSION NO. 33:**

14 Admit that You advised Proko Industries that your raw asbestos fiber was safer than
15 other types of raw asbestos fiber.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 33:**

17 See General Objections Nos. 1, 2, and 4. Union Carbide further objects to this Request
18 on the grounds that it is overly broad and not reasonably calculated to lead to the discovery of
19 admissible evidence. Union Carbide additionally objects to this Request on the grounds of
20 relevance in that it seeks information about a product manufacturer to whose products plaintiff
21 never claimed exposure. Subject to its objections, Union Carbide responds as follows: Denied
22 as to the relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including
23 1968. See also Union Carbide's Response to Request for Admission No. 27, including all
24 objections asserted therein.

25 **REQUEST FOR ADMISSION NO. 34:**

26 Admit that You represented to National Gypsum Company that your raw asbestos fiber
27 was safer than other types of raw asbestos fiber.
28

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

2 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
3 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
4 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
5 See Union Carbide's Response to Request for Admission No. 27, including all objections
6 asserted therein.

7 **REQUEST FOR ADMISSION NO. 35:**

8 Admit that You advised National Gypsum Company that your raw asbestos fiber was
9 safer than other types of raw asbestos fiber.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

11 See General Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this
12 Request on the grounds that it is overly broad and not reasonably calculated to lead to the
13 discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:
14 See Union Carbide's Response to Request for Admission No. 27, including all objections
15 asserted therein.

16 **REQUEST FOR ADMISSION NO. 36:**

17 Admit that You represented to Kelly-Moore Paint Company, Inc. that your raw asbestos
18 fiber was safer than other types of raw asbestos fiber.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

20 Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the
21 statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for
22 Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such
23 additional discovery is necessary, not harassing or overly burdensome. See General Objections
24 Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly
25 broad and not reasonably calculated to lead to the discovery of admissible evidence. Subject to
26 its objections, Union Carbide responds as follows: See Union Carbide's Response to Request
27 for Admission No. 27, including all objections asserted therein.

1 **REQUEST FOR ADMISSION NO. 37:**

2 Admit that You advised Kelly-Moore Paint Company, Inc. that your raw asbestos fiber
3 was safer than other forms of raw asbestos fiber.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 37:**

5 Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the
6 statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for
7 Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such
8 additional discovery is necessary, not harassing or overly burdensome. See General Objections
9 Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly
10 broad and not reasonably calculated to lead to the discovery of admissible evidence. Subject to
11 its objections, Union Carbide responds as follows: Denied for use in joint compound as to the
12 relevant timeframe of this plaintiff's claims of exposure, namely, prior to and including
13 September 1968. See Union Carbide's Response to Request for Admission No. 27, including all
14 objections asserted therein.

15 **REQUEST FOR ADMISSION NO. 38:**

16 Admit that You received a copy of the 1966 study by the Chemical Hygiene Fellowship
17 of Mellon Institute which addressed the potential of your raw asbestos fiber to cause fibrosis.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 38:**

19 Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the
20 statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for
21 Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such
22 additional discovery is necessary, not harassing or overly burdensome. See General Objections
23 Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly
24 broad and not reasonably calculated to lead to the discovery of admissible evidence. Union
25 Carbide additionally objects on the grounds that the Request is vague in that no timeframe is
26 provided for when the 1966 study was received by Union Carbide. Subject to its objections,
27 Union Carbide responds as follows: Denied as stated; admitted that Union Carbide received a
28

1 copy of a 1966 memo styled: "The Fibrogenic Potential of Asbestos Products via Intraperitoneal
2 Injection in Guinea Pigs, Rats and Rabbits and by the Intratracheal Route in the Rat."

3 **REQUEST FOR ADMISSION NO. 39:**

4 Admit that You received the 1966 study by the Chemical Hygiene Fellowship of Mellon
5 Institute which addressed the potential of your raw asbestos fiber to cause fibrosis in 1966.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 39:**

7 Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the
8 statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for
9 Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such
10 additional discovery is necessary, not harassing or overly burdensome. See General Objections
11 Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly
12 broad and not reasonably calculated to lead to the discovery of admissible evidence. Subject to
13 its objections, Union Carbide responds as follows: Denied as stated; admitted that Union
14 Carbide received in 1966 a copy of a memo styled: "The Fibrogenic Potential of Asbestos
15 Products via Intraperitoneal Injection in Guinea Pigs, Rats and Rabbits and by the Intratracheal
16 Route in the Rat."

17 **REQUEST FOR ADMISSION NO. 40:**

18 Admit that You received a copy of the 1966 study by the Chemical Hygiene Fellowship
19 of Mellon Institute regarding the potential of your raw asbestos fiber to cause fibrosis before
20 you ceased selling raw asbestos fiber.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 40:**

22 Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the
23 statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for
24 Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such
25 additional discovery is necessary, not harassing or overly burdensome. See General Objections
26 Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly
27 broad and not reasonably calculated to lead to the discovery of admissible evidence. Union
28 Carbide additionally objects on the grounds that the Request is vague in that no timeframe is

1 provided for when the 1966 study was received by Union Carbide. Subject to its objections,
2 Union Carbide responds as follows: See Union Carbide's Responses to Requests for Admission
3 Nos. 3 and 39, including all objections asserted therein.

4 **REQUEST FOR ADMISSION NO. 41:**

5 Admit that You commissioned the study by the Chemical Hygiene Fellowship of Mellon
6 Institute.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 41:**

8 Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the
9 statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for
10 Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such
11 additional discovery is necessary, not harassing or overly burdensome. See General Objections
12 Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly
13 broad, vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible
14 evidence. Subject to its objections, Union Carbide responds as follows: Admitted if the study
15 referred to in this Request is the same as the one referred to in Request No. 40.

16 **REQUEST FOR ADMISSION NO. 42:**

17 Admit that, between 1964 and 1985, you performed animal testing studies on the raw
18 asbestos fiber that you sold.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 42:**

20 Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the
21 statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for
22 Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such
23 additional discovery is necessary, not harassing or overly burdensome. See General Objections
24 Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly
25 broad and not reasonably calculated to lead to the discovery of admissible evidence. Subject to
26 its objections, Union Carbide responds as follows: Admitted in part and denied in part. See
27 Union Carbide's Responses to Request for Admissions Nos. 38-41, including all objections
28 asserted therein.

1 **REQUEST FOR ADMISSION NO. 43:**

2 Admit that You, between 1964 and 1985, you learned through animal testing studies that
3 the raw asbestos fiber had an equal or greater potential to cause fibrosis than other forms of raw
4 asbestos fiber than commercially available.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 43:**

6 Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the
7 statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for
8 Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such
9 additional discovery is necessary, not harassing or overly burdensome. See General
10 Objections Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds
11 that it is overly broad, vague, ambiguous, assumes facts not in evidence and is not reasonably
12 calculated to lead to the discovery of admissible evidence. Subject to its objections, Union
13 Carbide responds as follows: See Union Carbide's Responses to Request for Admissions Nos.
14 38-42, including all objections asserted therein.

15 **REQUEST FOR ADMISSION NO. 44:**

16 Admit that, between 1964 and 1985, you learned that the raw asbestos fiber you sold was
17 an equal or more potent carcinogen than other forms of raw asbestos fiber than commercially-
18 available.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 44:**

20 Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the
21 statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for
22 Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such
23 additional discovery is necessary, not harassing or overly burdensome. See General Objections
24 Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly
25 broad, vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible
26 evidence. Subject to its objections, Union Carbide responds as follows: See Union Carbide's
27 Responses to Request for Admissions Nos. 38-42, including all objections asserted therein.
28

1 **REQUEST FOR ADMISSION NO. 45:**

2 Admit that despite receiving the results of animal testing on your raw asbestos fiber, you
3 continued to supply raw asbestos fiber until 1985.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 45:**

5 Union Carbide objects to this Request on the grounds that the plaintiff has exceeded the
6 statutory limit of thirty-five (35) Requests for Admissions without providing a Declaration for
7 Additional Discovery pursuant to *Code of Civil Procedure* section 2033 which details why such
8 additional discovery is necessary, not harassing or overly burdensome. See General Objections
9 Nos. 1, 2, 4, and 6. Union Carbide further objects to this Request on the grounds that it is overly
10 broad, vague, ambiguous, assumes facts not in evidence and is not reasonably calculated to lead
11 to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as
12 follows: See Union Carbide's Responses to Request for Admissions Nos. 3 & 38-42, including
13 all objections asserted therein.

14
15 Dated: March 25, 2002

Respectfully submitted,

16 McKENNA & CUNEO, L.L.P.

17
18 By 
19 William J. Sayers
20 Farah S. Nicol
Susan Weisenberg Gilefsky

21 Attorneys for Defendant
22 **UNION CARBIDE CORPORATION**
23 (formerly known as Union Carbide
24 Chemicals and Plastics Company, Inc.)
25
26
27
28

EXHIBIT "A"

THE DISCOVERY COMPANY

Please note p. 1 -
that this is dated
October 1968.

file H-1

CALIDRIA ASBESTOS

"CALIDRIA" ASBESTOS SG-130 AND SG-210 For Tape Joint Compounds

Lowest Costs Two Ways

CALIDRIA Asbestos acts as a bodying and secondary thickening agent permitting formulation of lower density, more economical tape joint compounds without the sacrifice of performance. CALIDRIA Asbestos is produced by a proprietary manufacturing process that yields unusually high fiber content and more complete fiber liberation from the natural bundles. As a result, CALIDRIA Asbestos goes up to twice as far, pound for pound, as commercial grades of asbestos containing large amounts of other filler materials that have no specific desirable effects on tape joint compound properties.

Reduces Cracking

The fibers of CALIDRIA Asbestos behave as an active lyophobic colloid in aqueous dispersion; by this mechanism CALIDRIA Asbestos increases tape joint compound liquid cohesive strength during drying. Increased liquid cohesive strength greatly reduces the tendency for cracks over nail holes, in thick sections at the center of the joint, and along the feathered edges.

Enhances Sandability

CALIDRIA Asbestos contains mainly chrysotile fiber and is essentially free from abrasive contaminants, such as magnetite and serpentine rock dust. This composition results in a low density product, free from contaminants that interfere with sanding.

Improves Uniformity

Narrow and well-controlled particle size distribution, low alkalinity and high brightness are characteristic of CALIDRIA Asbestos. These properties are consistent from batch to batch and improve the uniformity of tape joint compounds using CALIDRIA Asbestos.

Suggestions for Use of CALIDRIA Asbestos

CALIDRIA Asbestos can be readily used in your present tape joint compound formulation. Add approximately one-half the proportion of asbestos you now use. Increase the proportion of calcium carbonate or other inert filler to make up for the lower quantity of asbestos. You may also be able to use slightly more water in your ready-mix and maintain your present viscosity level. No other changes in your

October, 1968
F-42258

CALIDRIA, CELLOSIZ, UCAR, and UNION CARBIDE are trade marks of Union Carbide Corporation.

"CALIDRIA" ASBESTOS SG-130 AND SG-210

For Tape Joint Compounds

Suggestions for Use of CALIDRIA Asbestos (Continued)

formulation or manufacturing procedure are required.

CALIDRIA Asbestos SG-130 has the coarser particle size; it finds use for

bedding compounds or perhaps spackling compound. The SG-210 has the finer particle size and is favored for topping compounds, all-purpose compositions, texture paints, and similar formulas.

A Suggested Ready-Mix Tape Joint Compound For Use With CALIDRIA Asbestos

	Parts by Weight Dry Basis
Fillers:	
Calcium Carbonate, No. 1 White (Thompson Weinman)	61.42
Mica, P80F (Western Mica)	21.00
Clay, ASP-400 (Minerals and Chemicals Philipp Corp.)	4.00
CALIDRIA Asbestos, SG-210 (Union Carbide)	4.58
Binder:	
UCAR Latex 131 (Union Carbide)	6.60*
Workability Control Agent:	
CELLOSIZ Thickener, TJC Grade (Union Carbide)	0.50
Drying Control:	
Ethylene Glycol (Union Carbide)	1.00
Defoamer:	
"Nopco" PD-1 (Nopco Chemical Company)	0.10
Dispersant:	
"Daxad" 30 (Dewey & Almy Chemical Div.)	0.60*
Bacteriostat:	
"Dowicide" A (Dow Chemical Co.)	0.20
	100.00

Total Water: about 56 parts by weight per 100 parts dry solids

* Contained solids basis

"CALIDRIA" ASBESTOS SG-130 AND SG-210
For Tape Joint Compounds

Typical Product Characteristics

CALIDRIA Asbestos	
SG-130	SG-210
Reflectance (G.E. Photovolt)	68%
Contained magnetite	2% max. ✓
Alkalinity (as % of Na ₂ O)	0.05 to 0.06
pH (5% aqueous slurry)	8.5 to 9.5
Surface area (BET)	50 to 60 m ² /g.
Oil Adsorption (DOP #/100# asbestos)	90 to 100
Wet Bulk, settled vol. (ml.) 10g/250 ml./1 hr.	110 to 120
Dry Bulk (#/ft. ³)	200
Water absorption (wt. % in filter cake)	7 to 8
Size distribution (cumulative % retained)	5 to 6
Wet Screen mesh size	55 to 60
100	62 to 65
200	
325	
	5
	Trace
	17
	3
	28 to 32
	10 to 15

Packaging and Shipping Information

Product Form - Opened (finely ground) chrysotile asbestos fiber.

Packaging -

CALIDRIA Asbestos	
SG-130	SG-210
One Package	40 lb.
Pallet Weight	30 lb.
Carload	1,600 lb.
Truckload	1,050 lb.
	2,000 lb.
	1,500 lb.

Shipping -

Classification - asbestos shorts

Rail point of origin - Welby, California (King City, California)

TOXICOLOGICAL PROPERTIES

It has been known for many years that some persons working in asbestos production were prone to develop a disabling lung disease. In time, this condition became known as asbestosis and was related to exposure to high concentrations of asbestos dust. With further experience, it was found that men could work with asbestos without development of lung disease if

dust concentrations were kept below a certain level. It is now generally accepted that a man can work a 40-hour week for a lifetime without developing asbestosis if the asbestos dust particle count is kept at or below 5 million particles per cubic foot of air. This dust concentration of 5 million particles per cubic foot of air is the Threshold Limit Value for asbestos, and no cases

TOXICOLOGICAL PROPERTIES (Continued)

of asbestosis are believed to have occurred when exposures have been maintained at or below this level, despite large-scale utilization (now approaching one million tons per year in the U.S.A.). This concentration of dust is generally not visible in the average work area unless a beam of light causing a Tyndall effect is present. Usually the dust concentration must be from 8-10 million particles per cubic foot before its presence is visible in average lighting conditions.

Several years ago, it was reported that there was an increase in the incidence of cancerous tumors, especially of the lung, associated with asbestosis. Recently there have been reports of some cancers occurring in individuals exposed to asbestos dust, but who have not developed clinical asbestosis. It is believed by most authorities that these cases have been associated with exposures significantly exceeding the Threshold Limit Value. A major manufacturer of asbestos products who also mines asbestos has not been able to show an increase in cancerous growths in men working where dust concentrations were maintained at the Threshold Limit Value.

Control of asbestos dust exposure is therefore necessary. The control methods are the standard ones applicable to a variety of dusty operations. They include closed

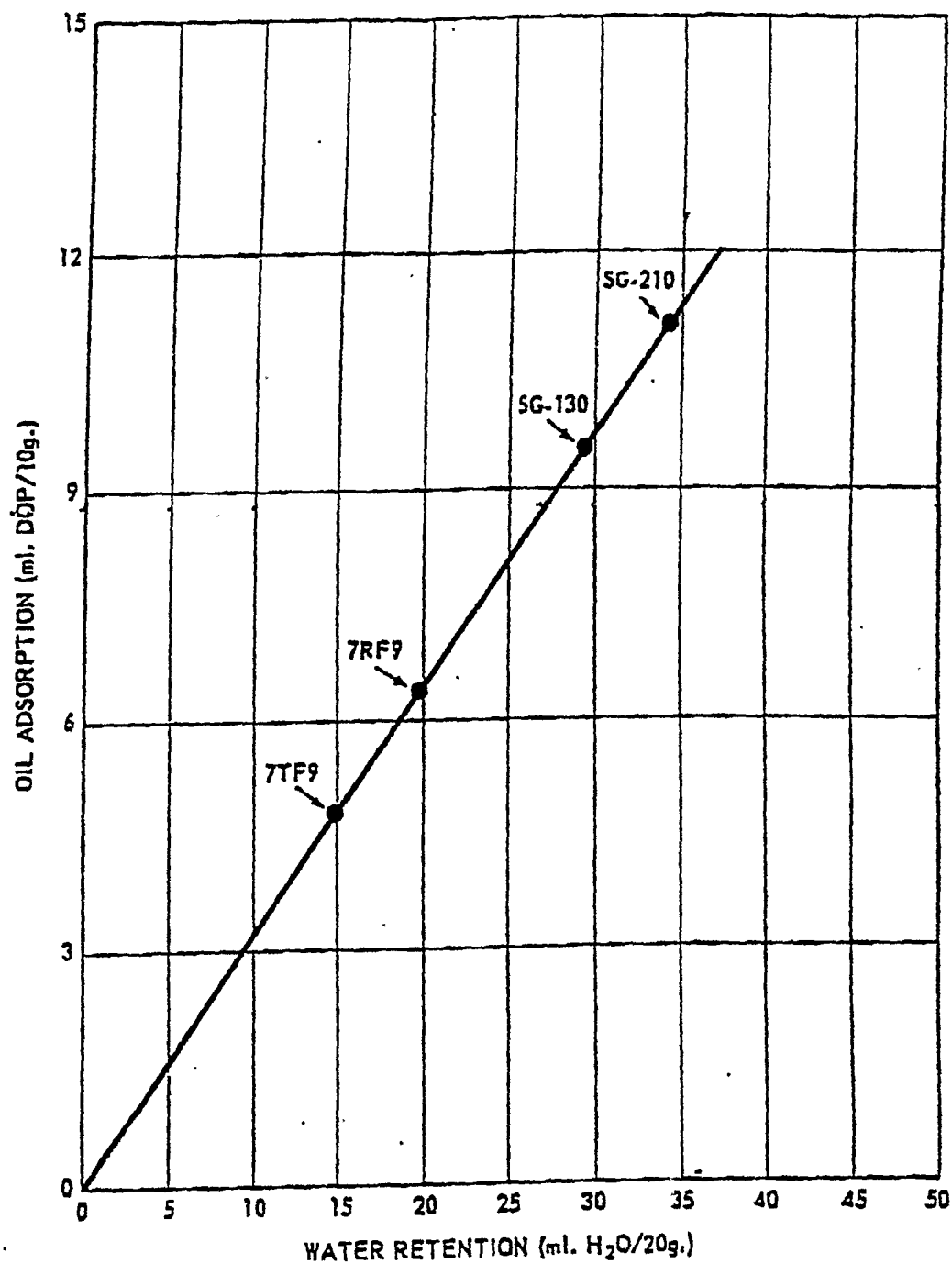
flow systems, wet processes where possible, and adequate exhaust ventilation where openings in the system are necessary. Pelletizing is sometimes used to improve the handling characteristics of otherwise dusty materials. Where satisfactory containment to stay within the Threshold Limit Value is impractical or impossible, efficient and reliable respirators are available for the protection of the employee. A program of environmental monitoring in manufacturing operations is highly desirable to determine that Threshold Limit Values are not being exceeded. Employees should wear respirators where dusting occurs in finishing products such as sanding taped joints.

Pre-employment and periodic physical examinations of workers are desirable. These should include chest X-rays to insure that the worker has no chest condition prior to work with asbestos and to determine that no lung changes are resulting from work with asbestos.

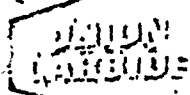
In conclusion, while asbestos dust in excess of the Threshold Limit Value is potentially harmful, as are many other dusts encountered in industry, it is as readily controlled as other such dusts and it can be used safely with appropriate precautions.

"CALIDRIA" ASBESTOS SG-130 AND SG-210

For Tape Joint Compounds



RELATIONSHIP BETWEEN WATER & OIL ADSORPTION
CAPACITY OF SOME ASBESTOS PRODUCTS
FOR TAPE JOINT ADHESIVE FORMULATIONS



THE DISCOVERY COMPANY

UNION CARBIDE CORPORATION
CHEMICALS AND PLASTICS
270 PARK AVENUE, NEW YORK, N.Y. 10017

Sales Offices

United States

ATLANTA, GEORGIA 30309	1371 Peachtree St., N. E.	404-892-7500
BALTIMORE, MARYLAND 21207	Beltway Bldg., 5707 Whitestone Rd.	301-944-8211
BOSTON, MASSACHUSETTS 02194	300 First Ave., Needham Hgts.	617-444-5400
BUFFALO, NEW YORK 14225	3343 Harlem Rd.	716-837-6450
CHARLOTTE, NORTH CAROLINA 28210	6230 Fairview Rd.	704-364-1400
CHICAGO, ILLINOIS 60606	120 South Riverside Plaza	312-822-7000
CINCINNATI, OHIO 45227	West Street and Madisonville Rd.	513-272-0206
CLEVELAND, OHIO 44114	1300 Lakeside Ave., N.E.	216-621-4202
CLIFTON, NEW JERSEY 07012	935 Allwood Rd.	201-778-2900
DALLAS, TEXAS 75207	2710 Stemmons Freeway	214-631-0010
DETROIT, MICHIGAN 48221	10421 West Seven Mile Rd.	313-341-3131
HARTFORD, CONNECTICUT 06103	410 Asylum St.	203-525-9345
HOUSTON, TEXAS 77027	3839 West Alabama Ave.	713-621-1000
INDIANAPOLIS, INDIANA 46220	720 Broad Ripple Ave.	317-255-3181
KANSAS CITY, MISSOURI 64141	910 Baltimore Ave.	816-221-2400
LOS ANGELES, CALIFORNIA 90058	2770 Leonis Blvd.	213-583-3081
MEMPHIS, TENNESSEE 38116	3385 Airways Blvd.	901-396-5375
MINNEAPOLIS, MINNESOTA 55416	3033 Excelsior Blvd.	612-927-4221
MOORESTOWN, NEW JERSEY 08057	Route 38 and Pleasant Valley Rd.	609-235-6200
NEW YORK, NEW YORK 10017	270 Park Ave.	212-551-4641
PHILADELPHIA (MOORESTOWN, NEW JERSEY SALES OFFICE)		215-923-3200
PITTSBURGH, PENNSYLVANIA 15220	Pkwy Center, 875 Greentree Rd.	412-922-5700
ST. LOUIS, MISSOURI 63105	10 South Brentwood Blvd.	314-726-0324
SAN FRANCISCO, CALIFORNIA 94106	22 Battery St.	415-982-1360
SEATTLE, WASHINGTON 98118	4726 Rainier Ave., South	206-723-8660
TULSA, OKLAHOMA 74114	2901 South Harvard	918-742-5524

Affiliates

Pan America

ARGENTINA	Union Carbide Inter-America, Inc., Buenos Aires
BRAZIL	Union Carbide do Brasil S. A., Sao Paulo, Rio de Janeiro
CANADA	Union Carbide Canada Ltd., Calgary, Lachine (P.Q.), Toronto, Vancouver, Winnipeg
CARIBBEAN	Union Carbide Inter-America, Inc., San Juan, Puerto Rico
CENTRAL AMERICA	Union Carbide Inter-America, Inc., Panama City, Panama
CHILE	Union Carbide Comercial Chile Ltd., Santiago
COLOMBIA	Union Carbide Colombia, S. A., Bogota
MEXICO	Unicarb Comercial, S. A. de C. V., Mexico, D. F., Guadalajara, Monterrey
PERU	Union Carbide Inter-America, Inc., Lima
VENEZUELA	Union Carbide de Venezuela, C. A., Caracas
WESTERN HEMISPHERE	Union Carbide Inter-America, Inc., New York, N. Y.

Eastern

AUSTRALIA	Union Carbide Australia Ltd., Sydney, N. S. W.
HONG KONG	Union Carbide Asia Ltd., Hong Kong
INDIA	Union Carbide India Ltd., Calcutta, Bombay, Madras, New Delhi
NEW ZEALAND	Union Carbide New Zealand (Pty) Ltd., Auckland
PAKISTAN	National Carbon Co. (Pakistan) Ltd., Karachi
PHILIPPINES	Union Carbide Philippines Inc., Manila
SINGAPORE	Union Carbide Singapore Ltd., Singapore

Europe

Middle East and North Africa

AUSTRIA	Union Carbide Austria Ges. m.b.H., Vienna
BELGIUM	Union Carbide Belgium N. V., Brussels
FRANCE	Union Carbide Europe s.a., Succursale Francaise, Puteaux-Paris
GERMANY	Union Carbide Deutschland, GmbH, Dusseldorf
ITALY	Union Carbide Italia S.p.A., Milan
MIDDLE EAST	Union Carbide Middle East Ltd., Athens, Greece
NETHERLANDS	Union Carbide Belgium N. V., Amsterdam
SCANDINAVIA	Union Carbide Norden A.B., Stockholm, Sweden
SPAIN	Union Carbide Iberica S. A., Madrid
SWITZERLAND	Union Carbide Europe s.a., Geneva
UNITED KINGDOM	Union Carbide U. K. Limited, London, Manchester, Rickmansworth, England

Africa

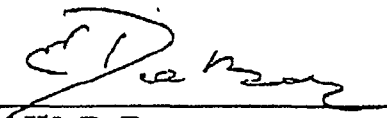
AFRICA (EAST)	Union Carbide Africa Ltd., Nairobi, Kenya
AFRICA (SOUTH)	Union Carbide South Africa (Pty) Ltd., Johannesburg, Capetown, Durban; Republic of South Africa

VERIFICATION

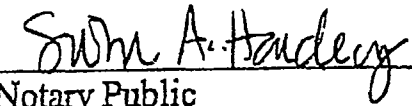
STATE OF NEW YORK)
)
COUNTY OF NEW YORK)

SS:

EDWARD W. DeBOR, being duly sworn, deposes and says: that he is Union Carbide Corporation's Assistant Manager, Vermont Records; that over the past years, he participated in collecting Union Carbide's asbestos-related documents for inclusion in the asbestos-related Document Repository maintained in the offices of Kelley, Drye & Warren, LLP, Union Carbide's national coordinating counsel for asbestos-related matters; that no single employee or former employee of Union Carbide (including deponent) has knowledge or information regarding all of the information set forth in the attached discovery responses; that the attached amended responses to Plaintiff's Request for Admissions (Set One) were assembled and prepared by counsel for Union Carbide based upon the documents contained in the Document Repository and upon information obtained by counsel from current and former employees of Union Carbide.


Edward W. DeBor
Assistant Manager, Vermont Records

Sworn to before me this 25th day of
March, 2002


Notary Public

SHOSHAN A. HANDLEY
Notary Public, State of New York
No. 02145066891
Qualified in New York County
Commission Expires Jan. 12, 2013