

- (f) Identify the disease alleged by claimant;
- (g) State the final disposition of the claim including any and all benefits paid, and the entity making such payments;
- (h) If different from the date on which the claim was filed, state the date on which Defendant first had notice of the claim; and,
- (i) Identify any and all documents referring to, relating to or reflecting said claim.

RESPONSE:

See Union Carbide's Responses to Interrogatory No. 89, including all objections set forth therein.

INTERROGATORY NO. 91: How many past or present employees of Defendant, its predecessors or related companies are known by you to be suffering from, to have suffered from, or to have suffered deaths caused by:

- (a) asbestosis?
- (b) lung cancer?
- (c) mesothelioma?

RESPONSE:

See General Objections Nos. 1-8. Union Carbide objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead the discovery of admissible evidence. Union Carbide 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:

Union Carbide is aware that one former employee of Union Carbide's King City Mill, Gabriel Acosta, instituted an action in state court in California in about September of 2000 in which he alleged that he suffered from an asbestos-related pleural disease. However, Mr. Acosta thereafter voluntarily dismissed his case against Union Carbide with prejudice in or about May 2002. Union Carbide is unaware of any worker's compensation claims for asbestos-related disease from workers at the Calidria mine and mill operated by Union Carbide. Union Carbide is unaware of any worker's compensation claims for asbestos-related disease from workers at Union Carbide's Boundbrook, New Jersey facility prior to 1975 when Union Carbide ceased manufacturing asbestos-containing phenolic molding compounds.