(i) State whether the products you applied, installed or contracted to apply or install were included as part of the project's contract price or whether you applied the products that were provided at the worksite;

(ii) Identify by manufacturer and trade name each and every asbestos-containing product applied or installed;

(iii) State the date(s) during which said application or installation took place;

(iv) Identify the employee(s) of Defendant who was (were) in charge of the job;

(v) Identify the person or entity for which the products were applied or installed; and

(vi) Identify all documents relating to such contract, application or installation.

RESPONSE:

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

Union Carbide's Calidria asbestos is a unique short-fiber chrysotile uncontaminated by tremolite asbestos. Due to the unique characteristics of Calidria, Calidria was suitable for use in limited products manufactured by third-party manufacturers and was not suitable for use in insulation products. Union Carbide was not engaged in the business of applying or installing its Calidria asbestos.

Phenolic resins and phenolic molding compounds were intermediate materials, sold to manufacturers who would use them, and other ingredients, to mold or manufacture other products. Union Carbide was not engaged in the business of applying or installing, asbestos-containing molding compounds.

INTERROGATORY NO. 23: Has this Defendant, any predecessor or any related company, ever engaged in the business of mining asbestos? If so:

(a) Identify which company(ies) whether (Defendant, predecessor or related company) engaged in said business;

(b) State the date(s) during which each said company engaged in such business;

(c) State each and every location at which such mining was done;

(d) Identify each and every officer, employee and/or agent of said company who, at any time, was in charge of each mining operation; and,

(e) Identify each and every entity, if any, to which said company sold the asbestos which was mined.