

the grounds it is 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 was a member of various organizations at various times throughout its existence, including, but not limited to the Industrial Health Foundation, the Industrial Hygiene Foundation, the American Industrial Health Association, Asbestos Information Association/North America, Chemical Manufacturers Association /Manufacturing Chemist Association, and American Petroleum Institute. Union Carbide also cooperated with work undertaken by the Pneumoconiosis Research Council of the United Kingdom, The Organization Resources Recovery Organization, and the Insulation Industry Hygiene Research Program. Union Carbide or Union Carbide personnel also participated in activities of the National Safety Council.

To the extent that additional 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.

INTERROGATORY NO. 95: Identify any and all persons attending, on behalf of Defendant, any predecessor or any related company, any meetings, seminars or symposiums held by the trade organizations, associations, or other entities identified in response to Interrogatory No. 94.

RESPONSE:

See General Objections Nos. 1-8. Union Carbide further objects to this Interrogatory on the grounds it is 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:

John Myers, former Product and Production Manager for asbestos (Calidria) was active in the AIA. Newton Ketchum and Paul McDaniel, retirees of Union Carbide Corp., participated in the Industrial Hygiene Foundation. Newell E. Bolton participated in the American Industrial Hygiene Association. Messrs. John Nichol, Tom Gagner and Ray R. Renkin, UCC employees, and Mr. Claude Eley, retired from Union Carbide Corp., participated in the National Safety Council.

To the extent that additional 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.

INTERROGATORY NO 96: Did any officer, employee, agent or representative of Defendant, of any predecessor, or of any related company, serve, at any time, as:

- (a) an officer, director or official of any trade organization, association or entity identified in response to Interrogatory No. 94?