INTERROGATORY NO. 25: Identify each and every source from which Defendant, any predecessor or related company, obtained raw asbestos and/or asbestos-containing material used by Defendant, any predecessor or related company, to manufacture or process any product listed in response to Interrogatory No. 19.

RESPONSE:

See Union Carbide's Responses to Interrogatory Nos. 19 and 23, including all objections set forth therein.

Calidria is a unique short-fiber chrysotile asbestos uncontaminated by tremolite, which Union Carbide extracted from an asbestos ore deposit in the New Idria area of San Benito County in California which was discovered in 1957. The mining was performed by a small number of employees and sub-contractors and was carried out every year or every other year, depending on the circumstances, during the period May to October. The ore deposit was mined by conventional open pit methods. The Calidria asbestos that was mined was stored until processed at Union Carbide's plant located near King City, California.

Union Carbide manufactured phenolic molding compounds under the trade name Bakelite. Some of Union Carbide's phenolic molding compounds were manufactured with asbestos. Union Carbide bought primarily short fiber Canadian chrysotile asbestos from several suppliers over the years, including but not limited to; Carey Canadian Mines, Rubberoid Company, Johns-Manville Company, Ltd., and Asbestos Corporation Ltd.. 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. 26: Is Defendant or any related company, as of the date of answering these interrogatories, still manufacturing, specifying, selling, distributing, applying or installing any asbestos-containing product? If so, give the brand/trade names of such products, type and percentage of asbestos in such product, and the date on which Defendant or any related company first manufactured, specified, sold, distributed, applied or installed said products.

RESPONSE:

See General Objections Nos. 1-8. Subject to its objections, Union Carbide responds as follows:

Union Carbide ceased manufacturing and selling asbestos-containing phenolic molding compounds by 1975. In June of 1985, Union Carbide ceased mining, milling and selling Calidria asbestos.

INTERROGATORY NO. 27: With respect to each and every product listed in response to Interrogatory No. 19, provide a full and complete description of the package in which the