

- (b) State the date(s) on which the same was conducted;
- (c) Describe the nature of the inspection, test or survey including, but not limited to, the results or conclusions thereof; and,
- (d) Identify any and all documents referring to, relating to or reflecting the same.

RESPONSE:

See Union Carbide's Response to Interrogatory No. 122, including all objections set forth therein.

INTERROGATORY NO. 124:

Identify:

- (a) Any expert whom you intend to call as a witness;
- (b) The subject matter on which the expert is expected to testify;
- (c) The substance of the facts and opinions to which the expert is expected to testify;
- (d) A summary of the grounds for each Opinion;
- (e) The address of such person and field of expertise;
- (f) Identify and produce each treatise, article or text upon which the expert will rely in testifying.

RESPONSE:

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

Pursuant to the governing Case Management Order, all experts that Union Carbide presently intends to call as witnesses in this litigation have been disclosed in its Sixteenth Amended Fact and Expert Witness Disclosure, dated March 17, 2003. Union Carbide reserves the right to amend and/or supplement its Fact and Expert Witness Disclosure.

INTERROGATORY NO. 125: Are there any policies of insurance which provide, or might provide, coverage on behalf of Defendant, any predecessor or any related company for the injuries alleged in Plaintiffs' complaints?

RESPONSE:

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