

possession of Union Carbide, this information is located in the repositories maintained by Union Carbide's counsel.

INTERROGATORY NO. 74: Does Defendant or any related company have any of the following in its possession, custody or control:

- (a) any package, container, label or item of sales literature which Defendant claims, constitutes or contains any warning which ever accompanied any product listed in response to Interrogatory Nos. 19 and 42?
- (b) any picture, photograph or like reproductive representation of any item described in subpart (a)?

RESPONSE:

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

Examples of certain bags and the warning labels utilized on all bags of Calidria asbestos are available in the repositories maintained by Union Carbide's counsel.

Additional information responsive to this Interrogatory, and in the possession of Union Carbide, is located in the repositories maintained by Union Carbide's counsel.

INTERROGATORY NO. 75: State the year that Defendant or any predecessor(s) was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust, promulgated by the American Conference of Governmental Industrial Hygienists, and identify the specific person(s) receiving such advise, and any and all documents communicating such advise.

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. Union Carbide also 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:

During the time that Union Carbide owned and operated its Calidria business, Union Carbide was aware of and recognized the early (pre-1972 OSHA Standard) Threshold Limit Value set forth by the American Conference of Governmental Industrial Hygienists (ACGIH) and the later Threshold Limit Value established by OSHA in 1972. In 1964, Union Carbide prepared an Asbestos Toxicology Report, which was given to Union Carbide's asbestos customers, many