

time have owned, more than a ten percent (10%) interest in this Defendant, and for each such person or entity identified, state the date(s) during which said person or entity owned more than a ten percent (10%) interest in Defendant and the specific type and amount of interest owned.

RESPONSE:

See General Objections Nos. 1-8. Union Carbide further objects to this Interrogatory on the grounds that it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide further objects to this Interrogatory on the ground that it seeks information in the public domain, equally available to the Plaintiffs. Subject to its objections, Union Carbide responds as follows:

Upon request, Union Carbide will make available for Plaintiffs' inspection and review copies of its annual reports for the last five years.

INTERROGATORY NO. 6: Identify any and all companies, businesses, corporations, and/or joint ventures in which this Defendant owns, or at any time has owned, more than a ten percent (10%) interest.

RESPONSE:

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

The Linde Air Products Company was founded in 1907 and merged into Union Carbide and Carbon Company in 1917. Union Carbide and Carbon Company merged with the Bakelite Corporation in 1939. Union Carbide and Carbon Company changed its name to Union Carbide Corporation in 1957. On January 1, 1989, the Linde Division of Union Carbide Corporation became a wholly owned subsidiary of Union Carbide Corporation known as Union Carbide Industrial Gases Inc. At that time there was a complete transfer of all assets and liabilities of the Linde Division to Union Carbide Industrial Gases Inc. Also at this time, Union Carbide Corporation became the holding company to another wholly owned subsidiary known as Union Carbide Chemicals and Plastics Company Inc. On June 30, 1992, Union Carbide Industrial Gases Inc. was spun off to become what is now known as Praxair, Inc., a corporation entirely separate from Union Carbide Corporation and Union Carbide Chemicals and Plastics Company Inc. Praxair, Inc. assumed all liabilities and became custodian of all records associated with the former Linde Division and Union Carbide Industrial Gases Inc. On April 27, 1994, Union Carbide Corporation was merged into Union Carbide Chemicals and Plastics Company Inc. and on May 1, 1994, Union Carbide Chemicals and Plastics Company Inc. changed its name to Union Carbide Corporation.

In 1977, Union Carbide acquired a company which prior to its acquisition by Union Carbide had manufactured a line of mastics, sealants, coatings and adhesives, some of which