Phenolic resins and phenolic molding compounds were intermediate materials, sold to manufacturers who would use them, and other ingredients, to mold or manufacture other products.

INTERROGATORY NO. 34: With respect to each product listed in response to original Interrogatory Number 19, was it a foreseeable use of said product that it might have to be removed, stripped or replaced at any time after application or installation?

RESPONSE:

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

No with respect to Calidria asbestos. Calidria is a unique short-fiber chrysotile uncontaminated by tremolite asbestos which Union Carbide extracted from an asbestos ore body in New Idria, California. Calidria as raw asbestos ore was not "removed, stripped or replaced after application or installation." Calidria was marketed and sold by Union Carbide or by Calidria distributors to manufacturers or producers who incorporated and used Calidria in their products or production processes. From 1963 to 1985, Union Carbide sold Calidria asbestos fiber to various third party manufacturers or distributors. The asbestos third party manufacturers to whom Union Carbide sold Calidria used it in manufacturing various products used in commercial applications. Union Carbide did not manufacture those products and had no control over the nature of the products in which the fiber was used.

No with respect to phenolic resins and phenolic molding compounds. Phenolic resins and phenolic molding compounds were intermediate materials, sold to manufacturers who would use them, and other ingredients, to mold or manufacture other products.

INTERROGATORY NO. 35: Identify each person who participated in the design and/or preparation of manufacturing specifications for each product listed in response to Interrogatory No. 19.

RESPONSE:

See General Objections Nos. 1-8. Union Carbide further objects to this Interrogatory on the grounds that it is overly broad. Subject to its objections, Union Carbide responds as follows:

To the extent that 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. 36: Identify any and all documents, including, but not limited to, written memoranda, specifications, blueprints, formulas, patterns and designs, referring to, relating to or reflecting the design, preparation, application and/or installation of each product listed in response to Interrogatory No. 19.

RESPONSE: