

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:

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.

The following divisions or subsidiaries of Union Carbide operated the Calidria business during the course of its existence:

Corporate Divisions of Union Carbide responsible for Calidria (1963-1985)

- (1963-1965) Nuclear Division
- (1965-1967) Mining and Metals Division
- (1967-1970) Chemicals and Plastic Division
- (1970-1984) Mining and Metals Division
- (1984-1985) UMETCO, a wholly owned subsidiary of Union Carbide, through Calidria Corporation, a wholly owned subsidiary of UMETCO.

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. 24: Has this Defendant, any predecessor or any related company ever purchased and resold raw asbestos? If so, with respect to each such purchase and resale:

- (a) State the date(s) of the transaction;
- (b) Identify any and all parties from which the raw asbestos was purchased; and,
- (c) Identify any and all parties to which the raw asbestos was sold.

RESPONSE:

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

Union Carbide was never in the business of purchasing or reselling other manufacturers' raw asbestos.