As referenced in the Asbestos Toxicology Report prepared by Union Carbide in 1964, the potential association between long-term exposure to some types of asbestos and certain diseases had been known for many years before Union Carbide entered the Calidria asbestos business. The Calidria asbestos mined and sold by Union Carbide from the Coalinga ore deposit is unique short-fiber chrysotile uncontaminated by tremolite asbestos. Tremolite is a form of amphibole asbestos that can contaminate chrysotile ore from certain locations and has also been recognized as a contaminant of some vermiculite and talc deposits. There is no scientific basis today to conclude that Calidria caused or contributed to the causation of mesothelioma, lung cancer, asbestosis, pleural plaques, or any alleged asbestos associated disease or condition in humans. There is scientific evidence that demonstrates that Calidria asbestos does not cause mesothelioma or any other diseases caused by other types of asbestos.

Despite the unique nature of the Calidria fiber, which did not pose the health risks that might be created by asbestos from other deposits, Union Carbide assumed that Calidria was as potentially hazardous, if safe practices were not observed, as other chrysotile asbestos and advised its employees and customers to treat its Calidria asbestos as such. Union Carbide advised its customers, many of whom had years of experience in handling asbestos and other minerals and chemicals, of the health effects and precautions applicable to asbestos fibers throughout the entire time that it mined and sold asbestos.

INTERROGATORY NO. 80: With respect to each disease set forth in Interrogatory No. 79:

(a) Identify the official who first obtained the knowledge, notice, information or understanding to which the interrogatory refers;

(b) Identify any and all documents referring to, relating to or reflecting such knowledge, notice, information or understanding; and,

(c) Describe what, if any, action said official, Defendant, any predecessor or any related company took in response to such knowledge, notice, information or understanding.

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:

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. 81: Is Defendant aware, or does Defendant possess knowledge or information concerning, a causal connection between exposure to asbestos or asbestos-containing products and: