

Union Carbide has presently identified the following asbestos-related testimony which may or may not relate to Union Carbide products:

1) John L. Myers

- A) Lester Rice v. Union Carbide Corporation, U.S.D.C., District of South Carolina, Civil Action No. 81-977-9, April 9, 1982.
- B) Simon DeWard v. Johns-Manville. et al., Superior Court for the County of Los Angeles, Civil Action No. C-298717 (and related cases), August 30, 1984.
- C) Bobby R. Sanford v. Johns-Manville Sales Corp. et al., Southern District of Texas, Galveston Division, No. G-82-325, September 4, 1986.
- D) Shirley Tate v. Certain-Tweed Corp., et al., District Court, 46th Judicial District, Hardeman County, Texas, No. 7591.
- C) Shirley Tate v. 3 M Corporation, et al., District Court, 94th Judicial District, Nueces County, Texas, No. 85-1559-C, July 27, 1987.
- E) Union Carbide Asbestos Removal Litigation Pennsylvania Cases, Bridgeport, Connecticut April 28, 1988.

2) Carl U. Derndehl. M.D.

- A) John Worm v. Rubicon Chemicals. Inc.. et al., U.S.D.C., District of Minnesota, 4th Division, St. Paul, Minnesota, No. 4-81-748, October 21, 1982.
- B) Henry Garry v. Union Carbide Corporation, U.S.D.C., Eastern District of Arkansas, Western Division, Civil No. LR-C-83-921, February 11, 1985.

3) Robert E. Peele

- A) Asbestos Cases Huntington, West Virginia, September 9-10, 1981.
- B) Asbestos Cases Southern District of Georgia, October 7, 1981.
- C) Freda K. Knight v. Union Carbide Corporation, U.S.D.C. Southern District of West Virginia, Huntington, W.VA., Civil Action No. 84-3425, May 22,

1987.

4) William Paul Woods

A) Keith Edwin Gibson v. Armstrong World Industries, Inc., et al., U.S.D.C. District of Colorado, Consolidated Civil Action No. 83-K-1756; Civil Action No. 84-K-912, May 18, 1987.

5) Richard J. Sexton, M.D.

A) Freda K. Knight v. Union Carbide Corporation, U.S.D.C. Southern District of West Virginia, Huntington, W.VA., Civil Action No. 84-3425, May 14, 1987.

6) Bert K. Barton

A) James W. Manisto v. American Brake Block Corporation et al., District Court, First Judicial District, Dakota County, Minneapolis, Minnesota, NO. C-5-88-1008, January 26, 1989.

B) Robert P. Payne, Josephine Stala as Administratrix of the Estate of Stanley Stala v. Advocate Mines, et al., Supreme Court of N.Y. Law Div., Middlesex County, Doc. No. L-10917-85, October 27, 1988.

7) Thomas J. Hall, M.D.

A) James W. Manisto v. American Brake Block Corporation, et al., District Court, First Judicial District, Dakota County, Minneapolis, Minnesota, NO. C-5-88-1008, January 10, 1989.

8) Howard Stephens

A) Keith Edwin Gibson v. Armstrong World Industries, Inc., et al., U.S.D.C. District of Colorado, Consolidated Civil Action No. 83-K-1756; Civil Action No. 84-K-912, May 18, 1987.

9) Myron Bennett

A) Keith Edwin Gibson v. Armstrong World Industries, Inc., et al., U.S.D.C. District of Colorado, Consolidated Civil Action No. 83-K-1756; Civil Action No. 84-K-912, May 18, 1987.

10 Harrison B. Rhodes, PhD.

A) Marie B. Soignet v. Montello, Inc., et al., U.S.D.C. for Eastern District of Texas, Beaumont

Division, 8-86-1193-CA, January 19, 1989.

INTERROGATORY NO. B.35:

Has defendant at any time since its inception, maintained any office or department dealing with medical research? If so, state:

- a. The name of each such department;
- b. The dates each such department was in operation; and
- c. The name, address and job position of each such person who has been in charge of said department or departments.

RESPONSE TO INTERROGATORY NO. B.35:

See general objections 4 and 5. Union Carbide also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, oppressive and harassing, irrelevant, immaterial, and unlikely to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Union Carbide's Medical Department was formally organized in 1939. Prior to that Union Carbide and Union Carbide facilities consulted physicians as appropriate upon need. The medical directors at Union Carbide have included the following individuals for the years respectively indicated below:

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| (1) Girard Cranch
[1938-1945] | (4) Thomas A. Lincoln
[1978-1985] |
| (2) Thomas Nale
[1945-1963] | (5) T. Guy Fortney
[1985-1989] |
| (3) John J. Welsh
[1963-1978] | (6) Jean Case
[1989-Present] |

The present duties of Union Carbide's medical director