

- (b) State how much Defendant, its predecessor and/or related company expended each year on research; and
- (c) State the percentage of said expenditure which was for research concerning the health affects of asbestos;
- (d) Identify the person(s) in charge of such department throughout its existence; and
- (e) Identify the person(s) in charge of any asbestos-related research conducted by such department throughout the years.

RESPONSE:

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

Information relating to the research and development of Union Carbide's Calidria asbestos and its phenolic molding compounds and resins is located in the repositories maintained by Union Carbide's counsel. Upon request, a visit to the repositories by Plaintiffs' counsel can be arranged at a mutually convenient time.

INTERROGATORY NO. 50: Did Defendant, any predecessor or any related company, or any medical department or industrial hygiene division thereof, maintain a medical and/or scientific library at any time from 1940 to the present? If so:

- (a) State the dates such library existed;
- (b) State the number of volumes maintained therein;
- (c) State the number of employees, part-time or full-time, assigned to the maintenance of said library; and
- (d) Identify the person(s) within the corporate structure to whom said library employees reported throughout the existence of the library.

RESPONSE:

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

Union Carbide maintained a Research and Development Library in South Charleston, West Virginia, as well as a library in its medical department in New York City. Union Carbide used its libraries in order to, among other things, conduct reference work and to monitor research in the scientific and medical communities. In addition to approximately 250-300 books in the New York library, the toxicology department in particular kept its subscriptions to medical journals and periodicals. These journals included the British Medical Journal, Journal of Occupational Health, American Hygiene Medical Journal, Journal of Archives of Industrial Health, Journal of Industrial Hygiene and Toxicology, Lancet, Archives of Environmental Health, and the Annals of New York Academy of Sciences, among others. Union Carbide's