

Friday, August 2, 2002, at 9:00 a.m. E.D.T. at the offices of Orrick, Herrington & Sutcliffe, L.L.P., 666 Fifth Avenue, New York, NY 10103-001 before an officer duly authorized to administer oaths. Said deposition will be videotaped and recorded stenographically.

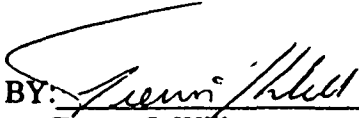
The subjects to be covered in the deposition include, but are not limited to, the following:

- A. Mr. Sayers' background, education, experience and training;
- B. Mr. Sayers' career with Union Carbide;
- C. Mr. Sayers' experiences in selling Union Carbide asbestos in the U.K. and Europe;
- D. The intent, preparation, interpretation, distribution, and all other aspects of Mr. Sayers' memorandum titled "Asbestos as a Health Hazard in the United Kingdom" and
- E. Events following Mr. Sayers' preparation of the memorandum.

This deposition will be continued from time to time and place to place until completed.

Dated this 9th day of July, 2002.

FOLEY & LARDNER
Attorneys for Union Carbide Corporation

BY: 
Trevor J. Will
Michael D. Rosenberg (MBN 0306782)

777 East Wisconsin Avenue
Milwaukee, Wisconsin 53202-5367
(414) 297-5536 (TJW)
(414) 297-4900 (facsimile)