

years respectively indicated below:

Girard Cranch (1938-1945)
Thomas Nale (1945-1963)
John J. Welsh (1963-1978)
Thomas A. Lincoln (1978-1985)
Guy Fortney (1985-1989)
Jean B. Case (1989-2000)

In 1948, the medical and industrial hygiene functions were divided. Oliver Stam became a corporate level industrial hygienist. In 1953, Paul McDaniel succeeded Mr. Stam. Upon Mr. McDaniel's retirement, Marvin Huffman served as the Manager of Risk Assessment Group, and Mr. Timothy J. Cawley served in that capacity from 1995 until 1998. From 1998 until 2001, Mr. Roy Myers served as the Manager of Risk Assessment Group.

In the early 1960s, Drs. Carl Dernehl and K. S. Lane of Union Carbide's Medical Department were given the corporate positions of Director and Assistant Director of Toxicology, respectively. Dr. Dernehl served as the Associate Corporate Medical Director with responsibility for toxicology from 1965 until 1979. From 1986 through 1992, Dr. Hilton Lewinsohn served as the Medical Director, Chemicals & Plastics Group. Dr. Lewinsohn is a recognized expert in asbestos-related medicine matters and pathologies.

Union Carbide's various divisions employed industrial hygienists for and in their respective facilities or premises. During the period of the Calidria business, Dr. Harrison Rhodes, an industrial hygienist, supervised the dust count program.

To the extent that additional 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. Upon request, a visit to the repositories by Plaintiffs' counsel can be arranged at a mutually convenient time.

INTERROGATORY NO. 48: Identify any and all persons or entities, other than the employees listed above, which provided industrial hygienic or similar services or information to, or for the benefit of, this Defendant, at any time from 1940 to date, including, but not limited to, employees of, or anyone retained by, any predecessor or related company.

RESPONSE:

See Union Carbide's Response to Interrogatory No. 47, including all objections set forth therein.

INTERROGATORY NO. 49: Does Defendant have, or has Defendant, any predecessor or any related company ever had, a Research Department? If so:

- (a) State when such department was established, and whether or not such department has operated continuously since being established;