

BM 2035	BM 2085	BM 2156	BM 2200	BM 2819
BM 3303	BM 3479	BM 3700	BM 4011	BM 4018
BM 4019	BM 4025	BM 4123	BM 4127	BM 5020
BM 5021	BM 5023	BM 5050	BM 5075	BM 5084
BM 5089	BM 5105	BM 5118	BM 5138	BM 5144
BM 5176	BM 5250	BM 5261	BM 5280	BM 5303
BM 5304	BM 5306	BM 5310	BM 5314	BM 5315
BM 5333	BM 5335	BM 5353	BM 5367	BM 5383
BM 5393	BM 5398	BM 5418	BM 5430	BM 5440
BM 5441	BM 5490	BM 5493	BM 5498	BM 5505
BM 5645	BM 5715	BM 5809	BM 5867	BM 6935
BM 6950	BM 6960	BM 7000	BM 7009	BM 7017
BM 7020	BM 7021	BM 7025	BM 7026	BM 7315
BM 7332	BM 7333	BM 7335	BM 7410	BM 7732
BM 7920	BM 7950	BM 8335	BM 8450	BM 8718
BM 8900	BM 15060			

INTERROGATORY NO. 20: With respect to each asbestos-containing product listed for each subpart of Interrogatory No. 19:

- (a) Identify the specific company (Defendant, predecessor, related company) which designed, manufactured, processed, specified, sold, distributed, applied, installed, patented or re-labeled such product;
- (b) State the year in which Defendant, its related company or its predecessor first designed, manufactured, processed, specified, sold, distributed, applied, installed, patented or re-labeled such product; and,
- (c) State the year in which the Defendant, its related company or predecessor last designed, manufactured, processed, specified, sold, distributed, applied, installed, patented or re-labeled such product.

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:

Calidria is a unique short-fiber chrysotile asbestos uncontaminated by tremolite, which Union Carbide extracted from an asbestos ore deposit in the New Idria area of San Benito County in California which was discovered in 1957. The mining was performed by a small number of employees and sub-contractors and was carried out every year or every other year, depending on the circumstances, during the period May to October. The ore deposit was mined by conventional open pit methods. The Calidria asbestos that was mined was stored until processed at Union Carbide's plant located near King City, California.

The following divisions or subsidiaries of Union Carbide operated the Calidria business