

INTERROGATORY NO. 92: For each employee referenced in your answer to Interrogatory No. 91, state the date that Defendant first knew, or had notice or information, that such past or present employee was suffering, or had suffered from:

- (a) asbestosis;
- (b) lung cancer;
- (c) mesothelioma.

RESPONSE:

See Union Carbide's Response to Interrogatory No. 89, including all objections set forth therein.

INTERROGATORY NO. 93: Identify any and all material safety data sheets concerning the products listed in response to Interrogatory Nos. 19 and 42 prepared, at any time, by, or on behalf of, Defendant, any predecessor or any related company.

RESPONSE:

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

During the time that Union Carbide operated its Calidria business, it prepared in 1972 and periodically revised (in 1976 and 1984) material safety data sheets for Calidria asbestos. Union Carbide has copies of its Calidria material safety data sheets in the repositories maintained by Union Carbide's counsel.

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.

INTERROGATORY NO. 94: Identify any and all trade organizations, associations, or other entities, including but not limited to American Textile Institute (ATI), Asbestos Information Association (AIA), Industrial Health Foundation or Industrial Hygiene Foundation (IHF), National Insulation Manufacturers Assn. (NIMA), National Insulation Contractors Assn. (NICA), National Safety Council (NSC), American Ceramics Society (ACS), National Building Materials Distributors Assn. (NIA), Sprayed Mineral Fiber Manufacturers Assn. (SMFMA), Thermal Insulation Manufacturers Assn. (TIMA), Quebec Asbestos Mining Assn. (QAMA), to which Defendant, any predecessor or any related company has belonged or in which any or all of the same have participated since 1925, and state the applicable dates of such membership or participation.

RESPONSE:

See General Objections Nos. 1-8. Union Carbide further objects to this Interrogatory on