

- (d) Any test, survey, study or similar matter concerning asbestos or asbestos-containing products, including, but not limited to, the products listed in response to Interrogatory Nos. 19 and 42.

RESPONSE:

See General Objections Nos. 1-8. Union Carbide further objects to this Interrogatory on the grounds it is overly broad, unduly burdensome vague and ambiguous. Union Carbide further objects to this Interrogatory insofar as it would require the disclosure of information protected by the attorney-client privilege and work-product doctrine. Subject to its objections, Union Carbide responds as follows:

To the extent that documents containing information responsive to this Interrogatory are in the possession of Union Carbide, they are located in the repositories maintained by Union Carbide's counsel.

INTERROGATORY NO. 105: If your answer to any one or more of the subparts of Interrogatory No. 104 is "Yes," then with respect to each subpart for which you answered "Yes":

- (a) Identify each and every board meeting at which said subject was discussed by stating the date(s) on which, and the location(s) at which, each meeting was held;
- (b) Identify any and all persons present at each such meeting; and,
- (c) Identify any and all documents, including, but not limited to, minutes, referring to, relating to, or reflecting each such meeting.

RESPONSE:

See Union Carbide's Response to Interrogatory No. 104, including all objections set forth therein.

INTERROGATORY NO. 106: Identify any and all seminars, symposiums, conferences or like gatherings attended by any officer, agent or representative of Defendant, any predecessor or any related company, at which the subject of asbestos, the health hazards of asbestos exposure, or the placement or providing of warnings was discussed.

RESPONSE:

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