

used, at any time, any or all of 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 that it is overly broad and unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Union Carbide responds as follows:

Information relating to the sales of Calidria and asbestos-containing phenolic molding compounds is located in the repositories maintained by Union Carbide's counsel. Upon Plaintiffs' request and identification of individual relevant customers, Union Carbide will provide copies of records of any sales to such customers, if records exist and are in the possession of Union Carbide's counsel.

INTERROGATORY NO. 110: Other than the cases identified in Interrogatory numbers 89 and 90, has defendant, any predecessor or any related company, ever appeared as a party in any lawsuit involving a claim or claims based upon allegations of property damage or seeking recovery of the costs of abatement from the use, application, installation or presence of asbestos or asbestos-containing products?

RESPONSE:

See General Objections Nos. 1-8. Union Carbide objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. Union Carbide further objects to this Interrogatory to the extent that it calls for information about Union Carbide employees or premises, or policies pertaining to Union Carbide employees or premises that are unrelated to the claims in this litigation on the grounds that such requests are overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Union Carbide further objects to this Interrogatory on the grounds that it seeks information equally available to Plaintiffs in the public domain.

INTERROGATORY NO. 111: If your answer to Interrogatory No. 110 is "Yes," identify each such lawsuit as follows:

- (a) Identify the plaintiff(s);
- (b) Identify all other defendants;
- (c) State when and where the case was filed;
- (d) Identify each court in which the case was heard or is pending, including appeals, and state the style and cause number of the case in each court; and,
- (e) State the current status of the case if it remains pending or, if the case has been disposed of, state the final disposition.