

EXHIBIT A

I. SPECIFICATIONS

1. All documents from 1989 to present reflecting or relating to communications with, to or from any individual, association, organization, partnership or company in which the existence of potential or issued patents was requested or disclosed.
2. All documents from 1989 to present reflecting that CARB or its staff investigated or considered issued or potential patent rights in proposing, adopting or modifying regulations.
3. All documents from 1989 to present reflecting or relating to any communication between CARB or its staff, on the one hand, and any other person or entity participating in a rulemaking process for the adoption of fuel regulations, on the other, in which the confidentiality of information, data or research findings was discussed or in which such confidentiality was requested or agreed to be modified.
4. The data provided to CARB staff from Unocal referenced in the letter of August 27, 1991 attached, such data to be in the form provided to staff by Unocal and to indicate the date of receipt of the data.
5. All documents or things reflecting or relating to information (other than the data referenced in the letter of August 27, 1991 from Unocal) provided to CARB or its staff by Unocal from 1990 to present.
6. All documents reflecting or relating to CARB or its staff's evaluation of any patent, including Unocal patents, at any time.
7. All documents reflecting or relating to communications from, with or to any oil company or its representative or attorney relating to Unocal from 1990 to present.
8. All documents reflecting or relating to communications from, with or to the Federal Trade Commission or its staff with respect to Unocal and/or CARB's rule-making for fuel regulations.
9. All documents reflecting or relating to communications from or to Mr. William Talbert from 1989 to present, including but not limited to his letter to Mr. Peter Venturini in or about April of 1991.
10. All documents reflecting or relating to investigations, evaluations or consideration of patents disclosed to Mr. Peter Venturini, CARB staff or CARB by Mr. William Talbert or Talbert

Fuel Systems Inc., including but not limited to the patents referred to in his letter in or about April of 1991.

11. All documents reflecting or relating to investigations, evaluations or consideration of patents relating to MTBE or the market position held by Atlantic Richfield Company with respect to MTBE production or sales.
12. All documents reflecting or relating to consideration by CARB or its staff to reconsider its Reformulated Gasoline regulations or rule-making in light of issued patents.
13. All documents reflecting or relating to data, information or research provided to CARB or its staff from Chevron relating to studies of the effect of driveability index on emissions.
14. All documents reflecting or relating to any analysis performed by CARB or its staff of any information, data or research provided by Unocal.
15. All documents reflecting or relating to any analysis performed by CARB or its staff of any information, data or research provided by Toyota.
16. All documents reflecting or relating to communications within CARB and/or its staff with respect to Unocal from 1990 to present.
17. Documents sufficient to show the current location of residence or business of Robert Fletcher and John Courtis.
18. Documents sufficient to show the identity of individuals, companies, organizations or associations with whom CARB staff and/or individual CARB members held private meetings prior to and/or as part of rule-making for Phase 2 RFG regulations.
19. Documents reflecting or relating to the date and content of private meetings held prior to and/or as part of rule-making for Phase 2 RFG regulations.
20. Documents reflecting or relating to the manner in which CARB staff determined to propose regulations, including the identity of individuals vested with the power to propose such regulations and the basis for their individual decisions to propose the regulations in the manner proposed.
21. Documents reflecting or relating to the manner in which CARB determined to pass the Phase 2 RFG regulations including how each Board member voted and the basis for each board member's vote.
22. The official rule-making record required to be kept by statute in connection with Phase 2 RFG regulations.

23. All documents concluding that the processes for enacting the 1991 regulations and 1994 predictive model were adjudicative in nature.
24. All documents relating to ARCO's statement of costs to make reformulated gasoline.
25. All documents reflecting or relating to the cost savings associated with or resulting from CARB's Predictive Model.
26. All documents referring or relating to CARB's promulgation of the 1991 Phase 2 RFG regulations and 1994 amendments to those regulations, including, but not limited to, all memoranda, analyses, studies, reports, or recommendations prepared by or for any CARB employee regarding or in connection with any facet of the Phase 2 RFG rules at any stage of their development, regardless of whether any matter discussed in such documents is incorporated into or addressed in the final rules.
27. All documents referring or relating to CARB's consideration of alternatives to the 1991 Phase 2 RFG regulations and 1994 amendments to those regulations, including, but not limited to, all memoranda, analyses, studies, reports, or recommendations prepared by or for any CARB employee regarding or in connection with any such consideration, regardless of whether any matter discussed in such documents is incorporated into or addressed in any subsequent CARB rules.
28. All documents referring or relating to the possibility that CARB may be locked into, or otherwise constrained in its ability to modify or amend, either the 1991 Phase 2 RFG regulations or the 1994 amendments to those regulations.
29. All documents referring or relating to any consideration of the costs and benefits of CARB's Phase 2 RFG rules or to the costs and benefits of including any specific gasoline characteristic or parameter in those rules, including, but not limited to, the costs and benefits of any particular level for each such characteristic or parameter.
30. All documents referring or relating to CARB's methodology for evaluating the costs and benefits of its regulatory initiatives and for determining whether benefits exceed costs.
31. All documents referring or relating to the costs and benefits of including a T50 specification as a parameter in CARB Phase 2 RFG regulations or the costs and benefits of specifying any particular level of T50.
32. All documents referring or relating to any specifications for gasoline characteristics other than T50 that would be needed to compensate for any given increase in the T50 level to maintain the same or comparable level of emissions of criteria pollutants.
33. All documents referring or relating to the costs and benefits of adopting alternative

specifications for gasoline characteristics other than T50 and increasing the T50 level to be specified in CARB's regulations.

34. All documents referring or relating to any consideration by CARB or its employees of any ceiling on the level of emissions of criteria pollutants that CARB's Phase 2 regulations would support.

II. DEFINITIONS AND INSTRUCTIONS

1. "Document" means the complete original or a true, correct and complete copy and any non-identical copies of any written or graphic matter, no matter how produced, recorded, stored or reproduced, including, but not limited to, any writing, letter, envelope, telegram, meeting minute, memorandum, statement, affidavit, declaration, book, record, survey, map, study, handwritten note, working paper, chart, index tabulation, graph, tape, data sheet, data processing card, printout, microfilm, index, computer readable media or other electronically stored data, appointment book, diary, diary entry, calendar, desk pad, telephone message slip, note of interview or communication or any other data compilation in your possession, custody or control, including all drafts or all such documents. "Document" also includes every writing, drawing, graph, chart, photograph, phono record, tape and other data compilations from which information can be obtained, translated, if necessary, by CARB through detection devices into reasonably usable form, and includes all drafts and all copies of every such writing or record that contain any commentary, notes, or marking whatsoever not appearing on the original.
2. "You," for purposes of this request, means CARB or any of its present or former employees, agents, attorneys, consultants, and all other persons acting or purporting to act on its behalf.
3. "CARB" means the California Air Resources Board and any bureau, division, office, or subpart thereof.
4. "Unocal," for the purposes of this request, means the Union Oil Company of California.

Unocal Corporation and any subsidiary or division thereof.

5. "Unocal Matter" means the investigation conducted by the FTC under Rule No. 011-0214 and this Administrative Proceeding, Docket No. 9305.

6. "Investigation" means any FTC investigation, whether formal or informal, public or non-public.

7. "Third Party" means any person; corporate entity; partnership; association; joint venture; state, federal or local governmental agency, authority or official; research or trade association; or any other entity other than (a) CARB or (b) Union Oil Company of California or any of its subsidiaries.

8. "Relating to" means in whole or in part constituting, containing, concerning, discussing, describing, analyzing, identifying or stating.

9. "Refiner" means any company in the business of refining oil or gasoline, as well as its parents and subsidiaries.

10. "RFG" means reformulated gasoline including, but not limited to: (a) CARB Phase 2 Reformulated Gasoline; (b) all other Phase 2 RFG, including Environmental Protection Agency ("EPA") Phase 2 RFG; and (c) reformulated gasoline that complies with any CARB or EPA regulations (including Phase 1 and Phase 3 regulations). This term also encompasses all technologies and technical features related to any RFG that complies with CARB or EPA regulations.

11. "Predictive Model" means the Predictive Model adopted and implemented by CARB under the 1994 Amendments to the CARB Phase 2 regulations.

12. The use of the singular shall be deemed to include the plural and vice versa. The terms "and" and "or" shall be interpreted liberally as conjunctive, disjunctive, or both, depending on the context,

so as to have their broadest meaning. Whenever necessary to bring within the scope of a request all the documents that might otherwise be construed to be outside its scope, the use of a verb in any tense shall be construed as the use of the verb in all other tenses. The term "all" includes any and vice versa.

13. All documents that respond, in whole or in part, to any portion of any document request shall be produced in their entirety, including all attachments, enclosures, cover memoranda and post-it notes.

14. If any privilege is claimed as a ground for not producing any document, provide for each such document withheld on the basis of privilege all information required by FTC Rules of Practice § 3.38A.

15. In the event that any responsive document was, but is no longer in your possession, state what disposition was made of it, when, and the reason for such disposition. In the event that a responsive document has been destroyed or returned to a Third Party, state (i) the reason for such document's destruction or return, the date on which the document was destroyed or returned, and the Third Party to whom the document was returned or on whose behalf the document was destroyed; (ii) the name, title, and Division thereof within CARB of the individual in whose possession, custody or control the document was when it was destroyed or returned; and (iii) the name, title, and Division thereof within CARB of the individual who destroyed or returned the document.

16. These document requests are continuing in nature, up to and during the course of the adjudicative hearing. All documents sought by these requests that you obtain or locate after you serve your responses must be immediately produced to counsel for Unocal by supplementary response.

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11/9/93
copy of file sent to
Greg Wirzbicki

REFINING AND MARKETING DIVISION

PLANNING AND SERVICES

911 Wilshire Blvd., 12th Floor
Los Angeles, California 90017

Facsimile: (213) 977-5927
Unocal Network: 230-5927
Verification: (213) 977-6409

DATE: August 27, 1991

TO: DEAN SIMEROTH

FAX NO.: (916) 327-7212

FROM: D. W. LAMB

PHONE NO.: _____
COMMENTS: _____

TOTAL PAGES INCLUDING COVER 2

PLAINTIFFS'
TRIAL EXHIBIT
U.S. District Court (C.D. Ca.)
C.A. No. CV-95-2379 KMW (JRx)
PTX 656

DEPOSITION
EXHIBIT
U.S. District Court (C.D. Ca.)
C.A. No. CV-95-2379 KMW (JRx)
PX 656

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Unocal Refining & Marketing Division
Unocal Corporation
911 Wilshire Blvd., P.O. Box 7600
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Telephone (213) 977-5974

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August 27, 1991

Dennis W. Lamb
Manager of Planning
Planning and Services

Mr. James D. Boyd
Executive Officer
State of California Air Resources Board
1102 Q Street
Sacramento, California 95812

Dear Mr. Boyd:

**PUBLIC AVAILABILITY
OF UNOCAL RESEARCH DATA**

On June 20, 1991, certain Unocal representatives met with Peter Venturini and other members of his staff. During that meeting, we presented the results of three phases in Unocal's Vehicle/Fuels testing program. We subsequently made the data base available to the staff and agreed to make the data public if necessary in the development of a predictive model for use in the certification of reformulated gasoline.

The staff has now proposed to develop such a predictive model and requested that we make the data public.

Please be advised that Unocal now considers this data to be non-proprietary and available to CARB, environmental interest groups, other members of the petroleum industry, and the general public upon request.

Sincerely yours,

Dennis W. Lamb

DWL:jd

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