

to which said assets or rights related; and

- (d). Identify any and all documents referring to, relating to or reflecting the transaction.

ANSWER TO INTERROGATORY 13.

Not applicable.

INTERROGATORY NO. 14: Other than any transaction identified in response to Interrogatories Nos. 10-13, has this Defendant ever been involved, in any capacity, including but not limited to, seller, transferor, grantor, franchisor, licensor, buyer, transferee, grantee, franchisee or subject of the transaction, in any transaction, of any kind, concerning any of the following:

- (a) the purchase/sale or transfer of ownership of a company, corporation or business which manufactured, sold, processed, distributed or contracted to apply asbestos and/or asbestos-containing products; or
- (b) the purchase/sale or transfer of ownership of the assets or rights to manufacture, sell, distribute or apply asbestos or asbestos-containing products; or
- (c) the purchase/sale or transfer of liabilities arising out of the manufacture, sale, processing, distribution or application of asbestos or asbestos-containing products.

ANSWER TO INTERROGATORY 14.

Yes.

INTERROGATORY NO. 15: If the answer to any sub-part of Interrogatory No. 14 is "Yes," with respect to each such transaction:

- (a) Identify all parties to the transaction;
- (b) Identify the subject matter of the transaction;
- (c) State the date of the transaction; and,
- (d) Identify any and all documents, referring to, relating to or reflecting the transaction.

ANSWER TO INTERROGATORY 15.

See answer to interrogatory 10. Further, BorgWarner answers that it sold its aftermarket division, Automotive Parts Division, in 1981 to Echlin, Inc.

INTERROGATORY NO. 16: State the first and last dates on which any asbestos containing product was manufactured by: