

- (b) a member of any committee or subcommittee of any trade organization, association or entity identified in response to Interrogatory No. 94?
- (c) the chair of any committee or subcommittee of any trade organization, association or entity identified in response to Interrogatory No. 94?
- (d) the representative or liaison for any trade organization, association or entity identified in response to Interrogatory No. 94 to any other trade organization, association or entity, including, but not limited to, A.T.I., I.H.F., N.I.M.A., A.I.A., N.I.C.A., T.I.M.A., Q.A.M.A., N.A.C., N.S.C., A.C.S., N.B.M.D.A., N.I.A., S.M.F.M.A.?

ANSWER:

Defendant does not currently know whether any officer, employee, agent or representative of Warner Electric Brake & Clutch Company served in any such capacity for either the Society of Automotive Engineers or the Power Transmission Distributor Association. Defendant believes that employee Stan Owens may have been, for some period of time, in the 1980's or 1990's, Chairman of a committee or group within the Power Transmission Distributor Association.

INTERROGATORY NO. 97:

For each subpart of Interrogatory No. 96 to which your answer is "yes," identify each and every person serving in such capacity and:

- (a) state the trade organization, association or entity for which such service was rendered;
- (b) specify the capacity of service, including identifying any specific committee, subcommittee or other trade organizations, associations or entities involved; and,
- (c) state the applicable dates of service.

ANSWER:

See Answer to Interrogatory No. 96, which is incorporated herein as if fully rewritten.