

Not applicable.

INTERROGATORY NO. 46: If your answer to Interrogatory No. 45 is "Yes," with respect to each such recommended design change:

- (a) State the product or products involved;
- (b) State the test or tests involved;
- (c) State the nature of the change recommended;
- (d) Identify the person(s) making the recommendation;
- (e) State the nature and effective date of any change made; and
- (f) Identify each and every person who participated in the decision to make or not make the recommended design change.

ANSWER TO INTERROGATORY 46.

Not applicable.

INTERROGATORY NO. 47: Identify any and all persons employed by Defendant, its predecessor or related company at any time from 1940 to date as an industrial hygienist or in a similar position.

ANSWER TO INTERROGATORY 47.

Borg Warner answers that the Corporation did not employ an individual for the purposes stated.

INTERROGATORY NO. 48: Identify any and all persons or entities, other than the employees listed above, which provided industrial hygienic or similar services or information to, or for the benefit of, this Defendant, at any time from 1940 to date, including, but not limited to, employees of, or anyone retained by, any predecessor or related company.

ANSWER TO INTERROGATORY 48.

Borg-Warner contracted from time to time with various consulting firms that may have provided industrial hygienic services. Those firms were Wilson Industrial Hygiene and Research Labs, National Loss Control Services Corp., OSHA Industrial Hygienist, Continental Casualty Co., IHI Kemron, and George D. Clayton Association, Clayton Environmental Consultants.

INTERROGATORY NO. 49: Does Defendant have, or has Defendant, any predecessor or any related company ever had, a Research Department? If so: