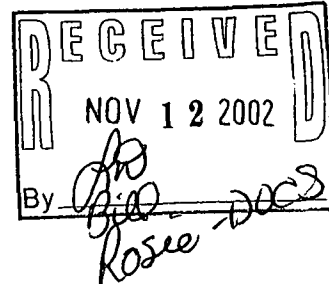


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IN THE CIRCUIT COURT  
THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS

IN RE: ALL ASBESTOS LITIGATION )  
FILED BY THE SIMMONS FIRM, LLC, )  
 )  
Plaintiffs )  
 )  
vs. )  
 )  
A.W. CHESTERTON, et al., )  
 )  
Defendants. )



**DEFENDANT KELSEY-HAYES COMPANY'S ANSWERS TO PLAINTIFF'S  
INTERROGATORIES**

**GENERAL OBJECTIONS**

1. Kelsey-Hayes Company ("Kelsey-Hayes") objects generally to plaintiffs' interrogatories to the extent that they are intended for purposes other than use in the Standiford case, the only asbestos case filed by the Simmons Firm, LLC, in this judicial circuit in which Kelsey-Hayes has been served.

2. Kelsey-Hayes objects generally to plaintiffs' interrogatories to the extent that they call for the disclosure of attorney-client privileged communications or attorney work product.

3. Kelsey-Hayes objects generally to plaintiffs' interrogatories to the extent that they call for Kelsey-Hayes to generate or create data or records not already compiled or maintained.

4. Kelsey-Hayes objects generally to the definitions contained in plaintiffs' interrogatories to the extent that they require Kelsey-Hayes to respond beyond the scope of the Illinois Rules of Civil Procedure. Kelsey-Hayes further objects generally to the definitions in that while the interrogatories address the "facility[ies] in question," that term is not defined, and in fact is reserved for later definition in plaintiffs' own instructions. Most of the interrogatories thus cannot be answered at this time. Without waiving this objection for any interrogatory, Kelsey-Hayes will limit its responses to the Kelsey-Hayes facility at Kingsway, Ohio, the sole Kelsey-Hayes facility plaintiff Standiford is ever known to have visited.

5. General Disclaimer: These answers to interrogatories are given to the best of the ability of the present Kelsey-Hayes Company. They provide information collected from numerous sources and people for the designated period of time. No single person associated with Kelsey-Hayes has knowledge necessary to supply every answer requested by these interrogatories and a number of individuals who might have had personal knowledge of the matters addressed by these interrogatories are either deceased or are no longer employees of Kelsey-Hayes. Kelsey-Hayes continues its ongoing investigation to locate information regarding the subject matter of these

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