

- (c) the inclusive dates during which you or any predecessor/related entity began designing or manufacturing each product identified in (b) and the reason why you stopped designing or manufacturing each product;
- (d) each source, type, percentage and grade of asbestos contained in each product you identified in (b) for each year during which the product contained *non-chrysotile* asbestos or asbestos-containing material/product as an ingredient or component, including any changes in the composition;
- (e) each entity from which you or any predecessor/related entity obtained *non-chrysotile* asbestos or asbestos-containing material/product for the design or manufacture of your asbestos-containing product and further specify which product you identified in (b) was designed or manufactured using *non-chrysotile* asbestos or asbestos-containing products/materials from each entity you identified in this subpart (e);
- (f) the manner in which each product was packaged, including a description of the package or container in which it was contained including, but not limited to, sizes available, colors, logos, and writings thereon;
- (g) the color, physical characteristics, and appearance of each product, including any changes and the dates of any such change;
- (h) all persons who were involved with or who have knowledge of the design or manufacture of the *non-chrysotile* asbestos or asbestos-containing material/product. Specify which person is the most knowledgeable concerning the design or manufacture of each product you identified in (a); and
- (i) all documents related to the areas of inquiry made in this Interrogatory.

ANSWER TO INTERROGATORY NO. 2:

*Borg-Warner objects to this Interrogatory s overly broad, burdensome, harassing, and unlimited in scope and time. Without waiving its objections, Answering Defendant responds that asbestos-bearing automatic transmission bands were manufactured from 1967 to 1982, and asbestos-bearing automatic transmission friction plates were manufactured from the early 1950s until 1983. The automatic transmission friction plates and transmission bands were packaged and shipped in bulk within brown cardboard boxes. The automatic transmission friction plates and transmission bands that incorporated friction paper supplied by Mead Paper Company may have contained chrysotile or crocidolite asbestos fibers which were encapsulated and/or impregnated within the paper and bound with a phenolic resin.*

INTERROGATORY NO. 3:

Have you or any predecessor/related entity ever sold or distributed any product containing asbestos *other than chrysotile*? If your Answer is "yes," identify:

- (a) the type, brand name, full name, and complete trade name of each *non-chrysotile* asbestos-containing material/product which you or any predecessor/related entity sold or distributed and, if applicable, the individual or entity from which you