claim exposure to any products sold or manufactured by Borg-Warner. Without waiving this objection, and subject to any additional objections herein, Borg-Warner provides its Answers herein.

8. Borg-Warner objects to Plaintiffs' Discovery to the extent that it seeks to require it to provide information other than that which may be obtained through a reasonably diligent search of its records.

9. The responses made herein are made without in any way waiving or intending to waive, but on the contrary intending to reserve and reserving: (1) the right to object on the grounds of competency, privilege, relevancy and materiality, or any other proper ground, to the use of any such information, for any purpose, in whole or in part, in any subsequent step or proceeding in this action or any other action; (2) the right to object on any and all grounds at any time, to any other discovery procedure involving or relating to the subject matter of Plaintiffs' Discovery; and (3) the right to supplement these answers should additional information be discovered.

Notwithstanding and without waiving these objections, Borg-Warner hereby responds to Plaintiffs' Discovery as follows:

REQUESTS TO PRODUCE

REQUEST NO. 1:

All documents relied upon in answering, identified in, or otherwise related to your Answers to Interrogatory No. 2.

ANSWER TO REQUEST NO. 1:

Borg-Warner objects to this Request as irrelevant, overly broad, burdensome, harassing and unlimited in scope and time. Without waiving its objections, Answering Defendant responds that there exist some responsive materials relating to the friction paper supplied by Mead Paper Company which can and will be made available if agreement can be reached on a reasonable limitation of relevancy, scope and time.

REQUEST NO. 2:

All documents relied upon in answering, identified in, or otherwise related to your Answers to Interrogatory No. 3.

ANSWER TO REQUEST NO. 2:

See response to Request No. 1.