2. Borg-Warner objects to Plaintiffs' Discovery to the extent that said Discovery seeks information protected by either the attorney-client privilege or the work-product doctrine. Without waiving these objections, and subject to any additional objections herein, Borg-Warner provides its Answers herein.

3. Borg-Warner objects to Plaintiffs' Discovery to the extent that it seeks information that is not within the custody or control of Borg-Warner, is otherwise within the public domain, or is otherwise equally or more available to Plaintiffs than to Borg-Warner. Without waiving this objection, and subject to any additional objections herein, Borg-Warner provides its Answers herein.

4. Borg-Warner objects to Plaintiffs' Discovery to the extent that it asserts and/or assumes unproven conclusions as established facts. Without waiving this objection, and subject to any additional objections herein, Borg-Warner provides its Answers herein.

5. Borg-Warner objects to Plaintiffs' Discovery to the extent that it assumes the truth of the allegations which are in dispute in this litigation and/or makes incorrect and/or untrue assertions, and/or assumes unproven conclusions as established facts. Without waiving this objection, and subject to any additional objections herein, Borg-Warner provides its Answers herein.

6. Borg-Warner objects to Plaintiffs' Discovery to the extent it seeks information regarding Borg-Warner's sales of any asbestos-containing products to any entities other than those specifically identified as being in the chain of distribution of products to which Plaintiffs allegedly were exposed, or to any employers or job sites other than any employers or job locations that Plaintiffs specifically identified as employers and job locations at which Plaintiffs allegedly were exposed to asbestos-containing products. Without waiving this objection, and subject to any additional objections herein, Borg-Warner provides its Answers herein.

7. Borg-Warner objects to Plaintiffs' Discovery to the extent it requires Borg-Warner to identify any product either sold or manufactured by Borg-Warner which may have contained asbestos or components containing asbestos when: Plaintiffs have failed and/or refused to specifically identify any product either sold or manufactured by Borg-Warner to which Plaintiffs claim exposure; Plaintiffs have failed or refused to identify any locations and/or job sites at which Plaintiffs claim exposure to any products sold or manufactured by Borg-Warner; or Plaintiffs have failed or refused to identify any time periods during which Plaintiffs