

IN THE CIRCUIT COURT
~~THIRD JUDICIAL CIRCUIT~~
MADISON COUNTY, ILLINOIS

IN RE: ALL ASBESTOS LITIGATION)
FILED BY SIMMONSCOOPER LLC,)
)
Plaintiffs,)
)
)
)
A.W. CHESTERTON, ET AL.)
)
Defendants.)

AMENDED RESPONSES TO INTERROGATORIES REGARDING BORG
WARNER'S USE OF CROCIDOLITE ASBESTOS FIBERS IN AUTOMATIC
TRANSMISSION PARTS

INTERROGATORY NO. 1:

Did Borg Warner manufacture crocidolite asbestos-containing automatic transmission bands from 1967 to 1982? If your answer is "yes", did Borg Warner supply crocidolite asbestos-containing automatic transmission bands to Ford Motor Company, General Motors Corporation and DaimlerChrysler Corporation or their predecessors from 1967 to 1982?

ANSWER: While Borg-Warner manufactured asbestos-containing automatic transmission bands for the period of 1967 to 1982, they did not all contain crocidolite asbestos for that period. Early in the time period and for certain applications Borg-Warner believes the bands contained chrysotile asbestos. Sales of the transmission bands, including those which contained crocidolite asbestos, were made at certain times during the period from 1967 until 1982 to Ford Motor Company, General Motors Corporation and the predecessor to Daimler Chrysler.

INTERROGATORY NO. 2:

Did Borg Warner manufacture crocidolite asbestos-containing automatic transmission friction plates in the early 1950s until 1983? If your answer is "yes", did Borg Warner supply crocidolite-containing automatic transmission friction plates to Ford