

ANSWER TO INTERROGATORY 78.

Borg-Warner answers that its products did not allow for free release of asbestos fibers because the asbestos fibers were encapsulated and impregnated in a phenolic resin and did not create a health hazard. Further Borg-Warner answers: No.

INTERROGATORY NO. 79: State the date on which any official of Defendant or its predecessor(s) first had knowledge, notice, information or understanding that exposure to asbestos would, could or might cause each of the following diseases:

- (a) Pleural disease;
- (b) Asbestosis;
- (c) Mesothelioma;
- (d) Lung cancer;
- (e) Any other forms of cancer.

ANSWER TO INTERROGATORY 79.

Borg-Warner is aware that there are health hazards from exposure to certain non-friction materials containing asbestos. The specific nature, source and timing of such knowledge would have been different for each Borg-Warner employee and cannot be documented. There is no evidence that Borg-Warner products cause or contribute to asbestos-related disease.

INTERROGATORY NO. 80: With respect to each disease set forth in Interrogatory No. 79:

- (a) Identify the official who first obtained the knowledge, notice, information or understanding to which the interrogatory refers;
- (b) Identify any and all documents referring to, relating to or reflecting such knowledge, notice, information or understanding; and,
- (c) Describe what, if any, action said official, Defendant, any predecessor or any related company took in response to such knowledge, notice, information or understanding.

ANSWER TO INTERROGATORY 80.

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