

employees.

ANSWER TO INTERROGATORY 119.

Trial transcripts from: William Arthur Brown, Jr. vs. Borg Warner, El Paso County, Texas Cause No. 95-1922 and/or Jelline Steed, et al. vs. Borg-Warner, et al., Wood County, Texas, Cause No. 92-141.

INTERROGATORY NO. 120: Has Defendant, any predecessor or any related company, ever been cited, warned, fined, sanctioned or otherwise officially written up for, any violation of a federal, state or local statute, law, rule, ordinance, code, administrative order, executive order, or the like, by any federal, state or local governmental entity, which violation concerned asbestos in any way?

ANSWER TO INTERROGATORY 120.

Not to this defendant's knowledge.

INTERROGATORY NO. 121: If your answer to Interrogatory No. 120 is "Yes," with respect to each such violation:

- (a) Identify the governmental entity issuing the citation, warning, fine, sanction or write-up;
- (b) State the date of the citation, warning, fine, sanction or write-up;
- (c) Describe the violation and state the date(s) during which it occurred;
- (d) Identify the statute, law, rule, ordinance, code or order to which the violation related;
- (e) State what, if any, specific fine, penalty, or sanction was imposed;
- (f) State the date in which and the manner in which said violation was corrected;
- (g) Identify any and all officials of Defendant, its predecessor or its related company having knowledge or notice of said violation and state the date on which said knowledge or notice was received; and,
- (h) Identify any and all documents referring to, relating to or reflecting said violation.

ANSWER TO INTERROGATORY 121.

Not applicable.

INTERROGATORY NO. 122: Has any federal, state or local government entity, at any time, conducted any inspection, test or survey concerning asbestos or asbestos exposure at any facility where the products listed in response to Interrogatory Nos. 19 and 42 were