

ANSWER: Borg-Warner objects to this interrogatory on the grounds that it is overly broad, burdensome, harassing and unlimited in scope. Without waiving its objection Borg-Warner answers: None known to exist.

15. Identify the method of distribution, including any distribution chain or network of wholesalers and/or distributors of defendant's asbestos products, and, in summary fashion, identify documents (by type) evidencing or confirming such chain or system of product distribution, including, but not limited to, distribution from and/or to other defendants in the instant litigation.

ANSWER: Borg-Warner objects to this interrogatory on the grounds that it is overly broad, burdensome and harassing. Without waiving its objection, Borg-Warner's asbestos-bearing products were sold primarily to Original Equipment Manufacturers (OEM's). Some products were distributed through national distributors.

16. Identify your distributors and/or suppliers of either raw or mined asbestos, fiber, and/or asbestos products with which you had business contact since 1930.

ANSWER: Borg-Warner objects to this interrogatory on the grounds that it is overly broad and burdensome. Without waiving its objection, Borg-Warner answers: all the asbestos bearing friction materials incorporated in Borg-Warner's clutch assemblies were supplied to Borg-Warner by other manufacturers, including Raybestos-Manhattan (Raymark), American Brake Shoe, Ausco, Gatke, Johns-Manville, National Friction Products, Russe, Standco, H.K. Porter, Inc., Thermoid Division, Akebono America, Inc., Bendix Textar, and Amco Works. Borg-Warner purchases such materials over approximately 60 years beginning in 1928. Borg-Warner did not resell these friction materials themselves; rather they were used as components in Borg-Warner's clutch products.

The asbestos purchased for Borg-Warner's Disc Brake Pads produced for model years 1971 to 1975, was purchased from Asbestos Corporation, Thetford Mines, Quebec, Canada, which sold the asbestos fibers to Borg-Warner through the Donald R. Fitzgerald Co., Chicago, Illinois.

17. Have any of the products listed in Interrogatory No. 8 above been altered in chemical composition since first being marketed?