

- (d) Mead Paper Company
- (e) The friction paper, which was glued to a steel stamping, called a friction plate assembly, was light brown in color. The paper on the clutch plates contained special grooving. The friction paper was also applied to the transmission bands.
- (f) Borg-Warner
- (g) Borg-Warner answers that it's products were the subject of numerous patents and such records are a matter of public record.
- (h) Borg-Warner answers that its supplier of friction paper, Mead Paper Company, in 1983 advised Borg-Warner of the removal of asbestos from its friction paper.
- (i) Borg-Warner continues to manufacture automatic transmission friction plates and transmission bands. Manufacture of products that contained encapsulated asbestos was discontinued in approximately 1983.
- (j) Asbestos was used because of its high temperature tolerance and durability.

Manual clutch assemblies:

- (a) Clutch assemblies may have contained facings supplied by various friction materials suppliers, believed to have contained chrysotile fibers.
- (b) Borg-Warner suspects that the formulations of friction materials may have varied depending on the supplier of those materials.
- (c) If modifications to the manual transmission clutch facings were made, they were made by the various suppliers of the facings.
- (d) All the 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, and H.K. Porter, Inc., Thermoid Division, Akebono America, Inc., Bendix Textar, and Amco Works. Borg-Warner purchased such materials over approximately fifty-eight (58) years beginning in 1928. Borg-Warner did not separately resell those friction materials under the Borg-Warner name or trademark but the friction materials were used as components in Borg-Warner's clutch products.
- (e) Clutch facings contained in the clutch assembly were solid form varying in color from gray to black to brown.
- (f) Borg-Warner, Borg & Beck, Long & Rockford
- (g) Borg-Warner answers that it's products were the subject of numerous patents