ANSWER:

See Answers to Interrogatory Nos. 89, 90, 110 and 111, which are incorporated herein as if fully rewritten.

INTERROGATORY NO. 134:

Is the defendant, any predecessor or related company, claiming any document responsive to any interrogatory or any request for production filed by The Simmons Firm as being protected from disclosure because of a privilege claimed for any reason? If yes, please list each document being claimed as protected from disclosure in a privilege log providing the date of the document, the identity of the author, what individual or entity the document was addressed to, the identity of any individuals or entities provided copies of the document, a brief description of the nature of the document, and the particular privilege claimed as shielding the document from disclosure.

ANSWER:

Defendant is reviewing documents provided by Buyer involving Warner Electric Brake & Clutch Company. Defendant reserves the right to claim any applicable privilege that applies to responsive documents. A privilege log will be developed upon completion of the document review.