

The defendant has no knowledge or records responsive to this interrogatory. Efforts are being made to determine this information.

INTERROGATORY NO. 6: Identify any and all companies, businesses, corporations, and/or joint ventures in which this Defendant owns, or at any time has owned, more than a ten percent (10%) interest.

ANSWER TO INTERROGATORY 6.

Efforts have been made to determine subsidiary corporations of defendant from corporate filings. These subsidiaries have been determined for years 1993, 1994, 1997 and 1998 and are attached hereto as Exhibit "A" and "B."

INTERROGATORY NO. 7: With respect to each corporation, company, business or joint venture identified in response to Interrogatory No. 6 state:

- (a) The type of business, conducted by such related company;
- (b) The past and present business relationships between said related company and Defendant;
- (c) The nature of the products or services which Defendant has sold to, or purchased from, said related company;
- (d) Whether or not said related company advertises or has advertised products or services supplied by Defendant;
- (e) Whether or not said related company sells or has sold Defendant's products or services within the State of Illinois and, if so, the approximate value of those sales from 1930 to date;
- (f) Whether or not said related company pays taxes of any type to the State of Illinois or to any political subdivision thereof and, if so, the type of taxes paid;
- (g) Whether or not Defendant controls or has controlled, directly or indirectly, in whole or in part, said related company's advertising; and,
- (h) The identity of any past or present officer or director of Defendant who, at any time, served as an officer or director of said related company.

ANSWER TO INTERROGATORY 7.

Answering defendant does not possess information regarding the numerous non-automotive subsidiaries/ divisions and/or corporations referenced in the exhibits in answer to Interrogatory #6 and, therefore, objects to this interrogatory as overly broad and burdensome. Without waiving these objections, Borg-Warner responds with respect to the automotive divisions, as follows: