

allegations, which are in dispute in this litigation and/or makes incorrect and/or untrue assertions, and/or assumes unproven conclusions as established facts. Without waiving this objection, and subject to any additional objections herein, Borg-Warner provides its Answers herein.

7. Borg-Warner objects to Plaintiffs' Discovery to the extent it seeks information regarding Borg-Warner's sales of any asbestos-containing products to any entities other than those specifically identified as being in the chain of distribution of products to which Plaintiffs allegedly were exposed, or to any employers or job sites other than any employers or job locations that Plaintiffs specifically identified as employers and job locations at which Plaintiffs allegedly were exposed to asbestos-containing products. Without waiving this objection, and subject to any additional objections herein, Borg-Warner provides its Answers herein.

8. Borg-Warner objects to Plaintiffs' Discovery to the extent it requires Borg-Warner to identify any product either sold or manufactured by Borg-Warner which may have contained asbestos or components containing asbestos when: Plaintiffs have failed and/or refused to specifically identify any product either sold or manufactured by Borg-Warner to which Plaintiffs claim exposure; Plaintiffs have failed or refused to identify any locations and/or job sites at which Plaintiffs claim exposure to any products sold or manufactured by Borg-Warner; or Plaintiffs have failed or refused to identify any time periods during which Plaintiffs claim exposure to any products sold or manufactured by Borg-Warner. Without waiving this objection, and subject to any additional objections herein, Borg-Warner provides its Answers herein.

9. Borg-Warner objects to Plaintiffs' Discovery to the extent that it seeks to require it to provide information other than that which may be obtained through a reasonably diligent search of its records.

10. The responses made herein are made without in any way waiving or intending to waive, but on the contrary intending to reserve and reserving: (1) the right to object on the grounds of competency, privilege, relevancy and materiality, or any other proper ground, to the use of any such information, for any purpose, in whole or in part, in any subsequent step or proceeding in this action or any other action; and (2) the right to object on any and all grounds at any time, to any other discovery procedure involving or relating to the subject matter of Plaintiffs' Discovery.

Notwithstanding and without waiving these objections, Borg-Warner hereby responds to Plaintiffs' Discovery as follows:

INTERROGATORIES

INTERROGATORY NO. 1: Identify the person answering these interrogatories on behalf of Defendant.

ANSWER TO INTERROGATORY 1.

These answers prepared by counsel are based upon information collected by legal counsel through communications with many corporate employees over a period of several years. The