

- (e) each facility at which each product identified in (b) was used and the dates thereof; and
- (f) all correspondence by or between you (and any predecessor/related entity) and Mead Paper Company concerning asbestos-containing products or materials.

ANSWER TO INTERROGATORY NO. 4:

Borg-Warner objects to this Interrogatory as overly broad, burdensome, harassing and unlimited in scope and time. Without waiving its objections, Answering Defendant incorporates its response in Interrogatory No. 2.

INTERROGATORY NO. 5

Did you or any predecessor/related entity operate or maintain any facility within a 50 mile radius of Bellwood, Illinois, at which asbestos or asbestos-containing materials/products were applied, installed, used, designed, manufactured, or from which asbestos or asbestos-containing materials/products were sold, distributed, relabeled for sale or distribution, purchased or acquired? If your Answer is "yes," as to each such location please identify:

- (a) the specific address or location of each such facility;
- (b) the purpose for which the facility was operated or maintained or the nature of the business conducted at each facility; and
- (c) the dates during which you or any predecessor/related entity operated or maintained each facility.

ANSWER TO INTERROGATORY NO. 5:

The facilities within a fifty mile radius of Bellwood producing or selling various automotive friction products some of which may have contained chrysotile asbestos include:

*Borg & Beck Division
6558 South Menard Avenue
Chicago, IL 60638
(1928-1986)*

*Spring Brummer Division
700 25th Avenue
Bellwood, IL 60104-1998
(1950 -1983)*

*Frankfort Plant
300 S. Maple Street
Chicago, IL
(1970 -1983)*