

and such records are a matter of public record.

- (h) Asbestos was removed from the facings by the manufacturer.
- (i) The clutch operation was sold in 1989.
- (j) Asbestos was used because of its high temperature tolerance and durability.

INTERROGATORY NO. 38: Identify any and all facilities at which Defendant, any predecessor or any related company, at any time, manufactured or processed asbestos containing products, or processed raw asbestos. For each such facility identified:

- (a) State the date(s) which said facility was owned and/or operated by Defendant, any predecessor or any related company;
- (b) State the date(s) during which asbestos-containing products and/or raw asbestos were manufactured or processed, at said facility; and,
- (c) Identify each person serving as the manager or supervisor of said facility during any time which the facility has been owned and/or operated by Defendant, any predecessor or any related company, and state the date(s) of the tenure as manager or supervisor for each.

ANSWER TO INTERROGATORY NO. 38.

Borg-Warner answers:

Spring Brummer Division was formed in 1940 and operates to present date. Disc brake pads for a limited market (for certain model years 1971 to 1975) and automatic transmission clutch plates and transmission brake bands were manufactured at Spring Brummer Division.

Clutch assemblies, incorporating materials supplied by various friction material manufacturers, were manufactured at the Borg & Beck Division and Rockford Division from 1928 until 1989 when the product line was sold. Suppliers of asbestos-bearing clutch facings for manual clutch assemblies began removing asbestos from their facings in the mid-1980s.

INTERROGATORY NO. 39: Identify any and all entities to which Defendant, any predecessor or related company sold, distributed or otherwise provided any type of asbestos-containing product, including, but not limited to, the products listed in response to Interrogatory No. 19.

ANSWER TO INTERROGATORY 39.