

ANSWER:

See Answer to Interrogatory No. 110, which is incorporated herein as if fully rewritten.

Objection: Defendant objects to this interrogatory on the ground that this Court directed that this interrogatory be redrafted, and it understands that plaintiffs have failed to do so. April 14, 2000 Order, ¶7.

INTERROGATORY NO. 112:

In any lawsuit, as described in Interrogatory numbers 89, 90, 110 and 111, has Defendant been subject to sanctions, a contempt citation or similar action for failing, or refusing to comply with, any court order, for discovery fraud, or for the failure to provide complete, accurate and truthful responses to discovery?

ANSWER:

Defendant currently is not aware of any such action being taken against Warner Electric Brake & Clutch Company in any such lawsuit.

INTERROGATORY NO. 113:

If your Answer to Interrogatory No. 112 is "yes," with respect to each such occasion described:

- (a) Identify the lawsuit involved, the court which imposed the sanctions or issued the contempt citation, and any other court which reviewed the same;
- (b) Describe the violation for which sanctions or contempt was imposed;
- (c) If the violation involved the failure or refusal to produce any document(s), identify any and all such documents;