

- (d) If the violation involved any failure to truthfully answer or to respond to interrogatories, identify any and all such interrogatories and your response thereto, including the person answering on your behalf;
- (e) State the present status or final disposition of the matter, which ever is applicable; and,
- (f) Identify any and all documents referring to, relating to or reflecting said matter, including, but not limited to, pleadings, exhibits and court orders.

ANSWER:

See Answer to Interrogatory No. 112, which is incorporated herein as if fully rewritten.

INTERROGATORY NO. 114:

In any lawsuit involving a claim or claims based upon allegations of injury, impairment, disease or death allegedly caused by exposure to asbestos, has any document or conversation as to which the defendant, any predecessor or related company, asserted the attorney/client privilege been held by any court to be not privileged on the basis of the crime/fraud exception?

ANSWER:

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. Subject to and without waiving objections, Defendant currently is not aware of any lawsuit involving a claim or claims based upon allegations of injury, impairment, disease or death allegedly caused by exposure to asbestos in which Warner Electric Brake & Clutch Company asserted an attorney-client privilege but the court did not uphold the attorney-client privilege on the basis of the crime/fraud exception.