

from disclosure because of a privilege claimed for any reason? If yes, please list each document being claimed as protected from disclosure in a privilege log providing the date of the document, the identity of the author, what individual or entity the document was addressed to, the identity of any individuals or entities provided copies of the document, a brief description of the nature of the document, and the particular privilege claimed as shielding the document from disclosure.

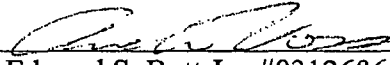
ANSWER: At this time, Kelsey-Hayes has not asserted a privilege with respect to any documents. However, if at a later time plaintiff narrows objectionably vague and overbroad interrogatories, Kelsey-Hayes reserves the right to assert any and all privileges with respect to documents that might be included within the requested information.

Dated: November __, 2002

Respectfully submitted,

GREENSFELDER, HEMKER & GALE, P.C.

By


Edward S. Bott Jr., #03126866
Andrew M. Voss, #06257487
Andrew R. Margrave, #06276646
10 South Broadway, Suite 2000
St. Louis, Missouri 63102
Telephone: (314) 241-9090
Facsimile: (314) 241-8624

Attorneys for Kelsey Hayes

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed this 8 day of November, 2002 to John Simmons, Esq., and Ted. N. Gianaris, Attorneys for Plaintiff, 301 Evans Avenue, Suite 300, Wood River, IL 62095 and to the Central Records Depository at 203 W. High Street, Edwardsville, IL 62025 by regular U.S. Mail with postage prepaid.

