

- (f) Any and all other names under which the product was sold, at any time;
- (g) The number and date of each patent or patent application for each product;
- (h) If the product continued to be produced after the deletion of asbestos, all reasons why the asbestos was deleted, the identity of the person(s) who made the decision to delete the asbestos, and the date the product was first produced without the asbestos;
- (i) If the product is no longer produced, all reasons it was discontinued, the identity of the person(s) who made the decision to discontinue the product, the brand name of the replacement product, and the date the replacement product first went into production; and
- (j) The reasons why asbestos was used as an ingredient in each such product.

ANSWER TO INTERROGATORY NO. 37.

Disc brake pads:

- (a), (b) The disc brake pads incorporated chrysotile (serpentine) asbestos fibers is approximately 31%.
- (c) None
- (d) The asbestos for Borg-Warner Corporation's disc brake pads for model years 1971 to 1975 and is believed to have been purchased through the Donald R. Fitzgerald Co., Chicago, IL from Asbestos Corporation, Thetford Mines, Quebec, Canada.
- (e) Disc brake pads were solid black products with some visible white fibers impregnated in them.
- (f) Borg-Warner
- (g) Borg-Warner answers that it's products were the subject of numerous patents and such records are a matter of public record.
- (h) Not applicable.
- (i) Disc brake pads were manufactured and sold by the Spring Brummer Division of Borg-Warner Corporation for a limited market for vehicle model years 1971-1975. Borg-Warner discontinued the manufacture of service brake products for economic reasons in 1975.
- (j) Asbestos was used because of its high temperature tolerance and durability.

Automatic transmission clutch plates and transmission bands

- (a)-(c) The automatic transmission clutch plates and brake bands contained friction paper supplied by Mead Paper Company with asbestos fibers which were encapsulated and/or impregnated within the paper and bound with a phenolic resin.