

sold asbestos-bearing products was Unit Parts, Oklahoma City, Oklahoma which was purchased in 1972 and divested in 1976.

5. Has defendant, at any time, engaged in the manufacture of products containing asbestos fibers? If so, please state:

- a. From what source or sources, if any, did your company obtain mined asbestos since the year 1930.
- b. Whether any warnings, cautions, caveats, or directions accompanied the material referred to in (a) and the language, nature, and presentation of said warning, cautions, caveats or directions accompanying or relating to said asbestos.
- c. Approximately what date said warnings, cautions, caveats or directions first appeared on such, mined asbestos referred to in (a) above.
- d. Where the asbestos or asbestos materials were manufactured by this answering defendant and/or its predecessor entities as described above.
- e. How long the defendant manufactured asbestos or asbestos materials.
- f. Whether any warnings, cautions, caveats or directions accompany the materials referred to in (a) and the nature, language, and graphic presentation of said warnings, cautions, caveats or directions accompanying said asbestos materials manufactured by this answering defendant and/or its predecessors.
- g. Approximately what date said warnings, cautions, caveats or directions appeared on the manufactured asbestos or asbestos materials.

ANSWER:

- a. Borg-Warner objects to this interrogatory on the grounds that is overly broad and burdensome. Without waiving its objection, Borg-Warner answers: all the asbestos bearing friction materials incorporated in Borg-Warner's clutch assemblies were supplied to Borg-Warner by other manufacturers, including Raybestos-Manhattan (Raymark), American Brake Shoe, Ausco, Gatke, Johns-Manville, National Friction Products, Russe, Standco, H.K. Porter, Inc., Thermoid Division, Akebono America, Inc., Bendix Textar, and Amco Works. Borg-Warner purchase such materials over