

Association and the National Safety Council.

INTERROGATORY NO. 95: Identify any and all persons attending, on behalf of Defendant, any predecessor or any related company, any meetings, seminars or symposiums held by the trade organizations, associations, or other entities identified in response to Interrogatory No. 94.

ANSWER TO INTERROGATORY 95.

Borg-Warner states that some of its employees are or were members of, or have attended seminars held by, various trade associations such as the American Society of Metals, the American Association of Mechanical Engineers, Society of Automotive Engineers, (Friction Subcommittee Transmission and Drivetrain Technical Committee), Asbestos Information Association and the National Safety Council. Former employee, Richard Rosenberg, attended certain AIA meetings, the dates of which are unknown. Borg-Warner held a membership in AIA from 1976 to 1983. The identity of the person(s) attending such other meetings is unknown as are the dates of membership.

INTERROGATORY NO 96: Did any officer, employee, agent or representative of Defendant, of any predecessor, or of any related company, serve, at any time, as:

- (a) an officer, director or official of any trade organization, association or entity identified in response to Interrogatory No. 94?
- (b) a member of any committee or subcommittee of any trade organization, association or entity identified in response to Interrogatory No. 94?
- (c) the chair of any committee or subcommittee of any trade organization, association or entity identified in response to Interrogatory No. 94?
- (d) the representative or liaison for any trade organization, association or entity identified in response to Interrogatory No. 94 to any other trade organization, association or entity, including, but not limited to, A.T.I., I.H.F., N.I.M.A., A.I.A., N.I.C.A., T.I.M.A., Q.A.M.A., N.A.C., N.S.C., A.C.S., N.B.M.D.A., N.I.A., S.M.F.M.A.?

ANSWER TO INTERROGATORY 96.

Not to this defendant's knowledge.

INTERROGATORY NO. 97: For each subpart of Interrogatory No. 96 to which your answer is "Yes," identify each and every person serving in such capacity and:

- (a) state the trade organization, association or entity for which such service was rendered;
- (b) specify the capacity of service, including identifying any specific committee,