

aware that any of these entities were engaged in the design, manufacture, selling, applying, installing, or relabeling of products containing asbestos.

INTERROGATORY NO. 6:

Identify any and all companies, businesses, corporations, and/or joint ventures in which[, between 1930 and 1980,] this Defendant own[ed], or at any time has owned, more than a ten percent (10%) interest [and which engaged in the design, manufacture, selling, distributing, applying, installing, or relabeling of products containing asbestos].

ANSWER:

Defendant objects to this interrogatory on the grounds that it is overbroad and unduly burdensome, and that the answers would not be reasonably calculated to lead to the discovery of admissible evidence. *See also* objections in Answer to Interrogatory No. 7 that are incorporated herein as if fully rewritten. Subject to and without waiving objections, Defendant will answer this interrogatory both for the United States operations and other entities in other countries (not defendants in these cases). Not all of the companies manufactured or sold a product that contained asbestos-containing friction materials.

Defendant is aware of the following United States acquisitions by Warner Electric Brake & Clutch Company after its incorporation in 1962, but Defendant believes that none of the acquisitions manufactured products with friction materials:

1. In 1963, Beaver Precision Products of Troy, Michigan manufactured precision ground ball bearing screws, primarily for machine tool and aircraft markets. (It is currently understood that the plant used, at least in 1986, an epoxy supplied by Dexter that contained a small amount of asbestos.)
2. In 1964, Pace Controls, originally was located in Massachusetts and subsequently moved to Illinois in approximately 1966. This company formed the basis for the motion control systems division of Warner Electric Brake & Clutch Company located in Marengo, Illinois.