

- (a) State when such department was established, and whether or not such department has operated continuously since being established;
- (b) State how much Defendant, its predecessor and/or related company expended each year on research; and
- (c) State the percentage of said expenditure which was for research concerning the health affects of asbestos;
- (d) Identify the person(s) in charge of such department throughout its existence; and
- (e) Identify the person(s) in charge of any asbestos-related research conducted by such department throughout the years.

ANSWER TO INTERROGATORY 49.

Yes, Borg-Warner Corporation maintained a Research Center in Des Plaines, Illinois from 1956 to 1988 when it was closed and sold. Borg-Warner expended approximately \$10,000,000 per year on research. Its purpose was for product development, testing and research. The Research Center supported all of Borg-Warner's diverse operations but the bulk of its work was for defendant's former Chemical subsidiary until late 1986 when it became more concerned with automotive products.

INTERROGATORY NO. 50: Did Defendant, any predecessor or any related company, or any medical department or industrial hygiene division thereof, maintain a medical and/or scientific library at any time from 1940 to the present? If so:

- (a) State the dates such library existed;
- (b) State the number of volumes maintained therein;
- (c) State the number of employees, part-time or full-time, assigned to the maintenance of said library; and
- (d) Identify the person(s) within the corporate structure to whom said library employees reported throughout the existence of the library.

ANSWER TO INTERROGATORY 50.

Borg-Warner states that its former employee, Richard Rosenberg, established a small library on June 12, 1976. The library was located at Borg-Warner's former Roy C. Ingersoll Research Center in Des Plaines, Illinois. The Research Center was closed in 1988, and the then-remaining contents of the library were sold or disposed of.

INTERROGATORY NO. 51: Identify any and all scientific or medical periodicals to which Defendant, any predecessor or any related company, or any medical department or industrial