

Sources of assemblies were (dates approximate):

Borg Warner Corporation Chicago, Illinois	1930 - 1985
Borg & Beck Sterling Heights, Michigan	1974 - 1984
LUK, Inc. Southfield, Michigan	1983 - 1985
Alma Products Company Alma, Michigan	1974-1985
Dalkin (Asahi facings) Troy, Michigan	Unknown

See Defendant's response to Interrogatory No. 6 about brake linings, which response is incorporated herein as if restated verbatim.

34. Does Defendant or any of its subsidiaries or predecessor currently have possession of any writings or contracts on those rebranding agreements set forth in the answer to Interrogatory No. 32? If the answer is affirmative, state:
- (a) The name, address, and job title of each person having custody of each of those documents and their current location.
 - (b) A brief description of each such document, including the dates and the parties signatory.

ANSWER:

Defendant objects to Interrogatory No. 34 to the extent it inquires of "predecessor companies" without identifying or defining such. Moreover, the interrogatory calls for a legal conclusion as to what companies are "predecessors" without setting forth a factual or legal foundation for such an opinion. Further, the interrogatory, like Interrogatory No. 32, is vague, ambiguous and indefinite in that it fails to define or limit "rebranding agreements." The interrogatory is overbroad, general and global and seeks information which is irrelevant and immaterial to any issue in this lawsuit and is not reasonably calculated to lead to the discovery of admissible evidence.