

Privileged & Confidential

To: Joseph Huber

From: Bill McLellan

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Asbestos Litigation

The Company has over 1,200 lawsuits pending relating to claims brought on behalf of former auto mechanics who claim exposure to asbestos in connection with performing vehicle repairs on brakes and clutches that contained asbestos.

Lawyers representing the plaintiffs have served discovery requests to the Company that seek information concerning:

- Brake specifications and performance standards. *BRAKE ENGINEERING (CORP.)*
- • History of brake lining usage and development. *TMP B.O.M. BACK THRU 1994 M.Y.*
- The identity of products that contained asbestos. *HYGENE - CTC*
- The brand or trade name of the product. *NO RECORD*
- The date the products were placed on the market. *NO RECORD*
- A description of the physical or chemical composition of the products. *SEE MS (CORP.)*
- The dates the products were removed from the market and the reasons for their removal. *CORP.*
- • A description of the appearance of the products. *DISC BRAKE PADS EITHER*
- • A detailed description of the intended use of the products. *BONDED OR RIVETED TO METAL BACKING PLATE.*
- The last year that the Company sold asbestos-containing products. *DO NOT KNOW*
- Documents generated relating to the design, preparation, or introduction into the market of products that contained asbestos. *CORP.*
- Testing conducted to determine potential health hazards. *N/A*
- Design changes or modifications as a result of testing. *N/A*
- Materials generated containing warnings about possible injury resulting from asbestos. —
- Books, pamphlets, etc. indicating that asbestos fibers may be hazardous to human health. —
- Membership in trade organizations that published documents relating to asbestos hazards. —
- Present use of asbestos in products. *NO PRODUCTS CONTAIN ASBESTOS (AT THIS TIME)*
- Whether asbestos-containing products can be used without liberating asbestos fibers into the air. —
- Dust count testing or studies. —

- Research into products that did not contain asbestos to replace asbestos-containing products. —
- The manufacture or sale of products which could substitute for asbestos-containing products. —

While information concerning many of the items identified above may not be available from Detroit Axle, we have a duty to inquire as to all of these items.

Your assistance in determining whether any such documents exist would be much appreciated. I recommend that you forward this message to individuals that potentially could have responsive documents and ask them to provide the documents to you in a folder. Those who do not have documents should respond with an E-mail message which reflects that, after reviewing their files, no such documents could be found.

Thanks for your help.