

ANSWER TO INTERROGATORY 10.

Yes.

INTERROGATORY NO. 11: If the answer to Interrogatory No. 10 is "Yes," with respect to each such predecessor:

- (a) State its full and correct name;
- (b) State its principal place of business;
- (c) State its State of incorporation;
- (d) State its date and manner of acquisition by Defendant;
- (e) Whether this predecessor was, at any time, authorized to transact business in the State of Illinois; and
- (f) Identify any and all documents referring to, relating to or reflecting the acquisition.

ANSWER TO INTERROGATORY 11.

Borg-Warner answers that at Borg-Warner's inception on June 5, 1928, four companies, Borg & Beck Co., Marvel Carburetor Co., Warner Gear Co., and Mechanics Universal Joint Co., merged to form Borg-Warner Corporation. Approximately one year later, Long Manufacturing Co. merged with Borg-Warner Corporation. In 1972, Borg-Warner acquired Unit Parts Division and it was subsequently sold in 1976.

INTERROGATORY NO. 12: Has Defendant ever acquired from another corporation, company, or business, by any means other than those specified in Interrogatory No. 10, assets or rights to manufacture, sell, distribute or apply asbestos or asbestos-containing products?

ANSWER TO INTERROGATORY 12.

Not to this defendant's knowledge.

INTERROGATORY NO. 13: If the answer to Interrogatory No. 12 is "Yes," with respect to each such acquisition:

- (a) State the full and correct name of the company from which such assets or rights were acquired;
- (b) State the principal place of business of the company from which said assets or rights were acquired;
- (c) Describe the assets or rights acquired, including the specific asbestos containing products