B1. State the name, address and job position of each and every individual signing these interrogatories on behalf of the defendant.

ANSWER: See Jurat Attached.

(a) State the name, address, employer and job position of each person whether defendant's employees or otherwise who were consulted with or who assisted in the answering of these interrogatories.

ANSWER: Robert Maples, Claims Supervisor, Chrysler Motors Corporation; James Knoll, Engineer, Chemical Division, Chrysler Motors Corporation; J.L. Koblin, Esq., Litigation and Insurance, Chrysler Motors Corporation, Highland Park, Michigan.

B2. Give a full and detailed description of the nature of the business that your company engaged in.

ANSWER: Chrysler Motors Corp. is engaged in the business of manufacturing automobiles and vans.

B3. When did your company commence its business?

ANSWER: Chrysler Motors Corporation began selling vehicles in 1925.

B4. (a) Are or have any of defendant's predecessors, affiliates, subsidiaries, or parent corporations engaged in the mining, sale and distribution of asbestos and/or asbestos fiber and/or asbestos containing insulation products? If so, state the name of each such entity, describe the nature of the involvement that each entity has or has had in the mining, distribution or sale of these products and materials and set forth the inclusive dates each was involved in each aspect of this business.

ANSWER: No.

(b) As to each such entity referred to in (a) above, state:

ANSWER: Not applicable.

(i) The relationship between defendant and each such entity;

(ii) The date each such relationship began and terminated;

(iii) The names and addresses of each such entity's corporate officers and Board of Directors;

(iv) The names and addresses of your corporate officers and Board of Directors.

B5. From the year 1925 until the present, identify and state the address of any organization in which defendant, its officers, agents or employees have belonged having anything to do with setting standards, regulations or the conducting of research into the use of asbestos, asbestos products or asbestos fiber.

ANSWER: The American Industrial Hygienist Association; The Friction Material Safety Institute; National Safety Counsel; Motor Vehicle Manufacturers Association.