

INTERROGATORY NO. 7

For each facility identified in your Answer to Interrogatory No. 5, identify all documents related to the health and safety concerning the use of asbestos (including raw asbestos) or asbestos-containing products/materials, including but not limited to correspondence, documents, memoranda, and contracts.

ANSWER TO INTERROGATORY NO. 7:

Borg-Warner objects to this Interrogatory as overly broad, burdensome, irrelevant, unlimited in scope and time, and seeking information not reasonably calculated to lead to the discovery of admissible evidence. By way of further objection, the materials with which our employees were working and the conditions under which they worked were different from those which a customer or end-user encountered.

INTERROGATORY NO. 8

In your Answer to Plaintiff's Interrogatory No. 32, you stated that you retained firms to perform consultations with respect to industrial hygiene. With respect to that Answer, please identify:

- (a) the name and address of each consulting firm;
- (b) the facilities at which each consulting service identified in (a) was utilized;
- (c) each date on which each consulting firm identified in (a) performed the service at each facility identified in (b);
- (d) the purpose for which you retained each consulting firm identified in (a); and
- (e) all documents related to the areas of inquiry made in this Interrogatory.

ANSWER TO INTERROGATORY NO. 8:

Borg-Warner objects to this Interrogatory as overly broad and unlimited in time. Further, the materials with which our employees were working and the conditions under which they worked were different from those which a customer or end-user encountered. Without waiving its objections, Answering Defendant responds that services by the firms identified in its responses to Interrogatory No. 32 took place at the following locations: (i) Clutch Systems Division, Chicago, IL 60638; (ii) Borg & Beck Division, 6700 18 ½ Mile Road, Sterling Heights, MI; (iii) Spring Division, 700 South 25th Avenue, Bellwood, IL 60104. Testing occurred on many different occasions from 1958 through 1988. The dates are too numerous to here identify or list. There exist some responsive materials which can and will be made available if agreement can be reached on a reasonable limitation of scope and time.