(c) State whether you assert the privilege with respect to disclosing the document or conversation in this case.

ANSWER TO INTERROGATORY 115.

Not applicable.

INTERROGATORY NO. 116: Identify any and all expert witnesses who have testified on behalf of Defendant, any predecessor or any related company in any case listed in response to Interrogatory No. 111.

ANSWER TO INTERROGATORY 116.

Trial testimony was given on behalf of defendant by: Dr. Hans Weill, Dr. Robert Ross, Mr. Arne Anderson, Dr. Graham Gibbs and Dr. Phillip Cagle in the William Arthur Brown, Jr. vs. Borg Warner, El Paso County, Texas Cause No. 95-5922 and/or Jelline Steed, et al. vs. Borg-Warner, et al., Wood County, Texas, Cause No. 92-141.

INTERROGATORY NO. 117: Identify any and all present or former directors, officers, employees or agents of Defendant, any predecessor or any related company, who have testified on behalf of or against Defendant, any predecessor or any related company, in any of the lawsuits listed in response to Interrogatory No. 111, other than persons who testified as plaintiffs in their own cases.

ANSWER TO INTERROGATORY 117.

Trial testimony was given on behalf of defendant by: Robert W. Hornick on behalf of Borg-Warner in the William Arthur Brown, Jr. vs. Borg Warner, El Paso County, Texas Cause No. 95-5922.

INTERROGATORY NO. 118: Identify any and all present or former directors, officers, employees or agents of Defendant, any predecessor or any related company, other than persons appearing as adverse parties, who have testified against Defendant, any predecessor or any related company in any proceeding involving the subject of asbestos, including, but not limited to, workers' compensation hearings, or any hearing before any government body.

ANSWER TO INTERROGATORY 118.

None known.

INTERROGATORY NO. 119: With respect to your answers to Interrogatory Nos. 116, 117 and 118, identify any and all documents, including, but not limited to, transcripts or notes of testimony, referring to, relating to or reflecting the testimony of such expert witnesses or