

INTERROGATORY NO. 9:

State whether any of Defendants' present or former officers or directors [from 1930 to 1980] ever served (whether before, during or after becoming Defendants' officer or director) as an officer or director of any other company, corporation or business which manufactured, sold or distributed asbestos or asbestos-containing products and, if so, please:

- (a) Identify each officer and director of Defendant, who served as such other company's officer or director; and
- (b) Identify each company, corporation or business for which each such officer or director served, each position held by such officer or director for such other company, corporation or business, and the time periods each position was held.

ANSWER:

See Answer to Interrogatory No. 8, which is incorporated herein as if fully rewritten. Defendant objects to this interrogatory as overly broad and unduly burdensome. Subject to and without waiving objections, Defendant has no reason to know the answer to this question except to the extent provided in Answer to Interrogatory No. 8. One or more of Warner Electric Brake & Clutch Company's officers may have served as an "officer" of the Warner Electric Division of Dana but not as an officer of Defendant.

INTERROGATORY NO. 10:

Has Defendant ever acquired, through purchase, reorganization or merger, another company, corporation or business which manufactured, sold, processed, distributed or contracted to apply, asbestos and/or asbestos-containing products?

ANSWER:

See Answers to Interrogatory Nos. 6, 16, 19, 20, which are incorporated herein as if fully rewritten. Defendant believes that Warner Electric Brake & Clutch Company's domestic acquisitions reported in Answer to Interrogatory No. 6 did not involve asbestos-containing friction