

ANSWER TO INTERROGATORY 59.

Not applicable.

INTERROGATORY NO. 60: Did Defendant, its predecessor or related company, take any action as a result of any study or studies set forth in response to Interrogatory Nos. 56 and 58? If so, identify each and every study which resulted in some action being taken, and:

- (a) Describe the actions taken, including the effective date of said actions;
- (b) Identify any and all persons, including, but not limited to, directors, officers, agents and employees of Defendant who participated in the decision to undertake said actions; and
- (c) Identify any and all documents referring to, relating to or reflecting said actions, or any subsequent modification or discussion of the same.

ANSWER TO INTERROGATORY 60.

Records regarding industrial hygiene reports for the various Borg-Warner automotive component manufacturing facilities are available for viewing by appointment through Borg-Warner's counsel.

INTERROGATORY NO. 61: Has Defendant, any predecessor, or any related company, or any person or entity acting on behalf thereof, at any time, conducted any study(ies) designed to minimize or eliminate the inhalation of asbestos dust and fibers by those using, handling or exposed to any product listed in response to Interrogatory Nos. 19 and 42?

ANSWER TO INTERROGATORY 61.

Borg-Warner answers that its products did not allow for free release of asbestos fibers because the asbestos fibers were encapsulated and impregnated in a phenolic resin and did not create a health hazard. Further, Borg-Warner answers that it has no current knowledge of such studies.

INTERROGATORY NO. 62: If your answer to Interrogatory No. 61 is "Yes," with respect to each such study:

- (a) Identify the product involved;
- (b) Identify the person(s) and/or entity(ies) conducting said study;
- (c) State the date said study began and the date on which it was completed;
- (d) Identify any and all persons, including, but not limited to, directors, officers, agents or employees of Defendant, who participated in the decision to have said study conducted;