

ANSWER TO INTERROGATORY 91.

See response to Interrogatory #90.

INTERROGATORY NO. 92: For each employee referenced in your answer to Interrogatory No. 91, state the date that Defendant first knew, or had notice or information, that such past or present employee was suffering, or had suffered from:

- (a) asbestosis;
- (b) lung cancer;
- (c) mesothelioma.

ANSWER TO INTERROGATORY 92.

See response to Interrogatory #90.

INTERROGATORY NO. 93: Identify any and all material safety data sheets concerning the products listed in response to Interrogatory Nos. 19 and 42 prepared, at any time, by, or on behalf of, Defendant, any predecessor or any related company.

ANSWER TO INTERROGATORY 93.

None known to be currently available.

INTERROGATORY NO. 94: Identify any and all trade organizations, associations, or other entities, including but not limited to American Textile Institute (ATI), Asbestos Information Association (AIA), Industrial Health Foundation or Industrial Hygiene Foundation (IHF), National Insulation Manufacturers Assn. (NIMA), National Insulation Contractors Assn. (NICA), National Safety Council (NSC), American Ceramics Society (ACS), National Building Materials Distributors Assn. (NIA), Sprayed Mineral Fiber Manufacturers Assn. (SMFMA), Thermal Insulation Manufacturers Assn. (TIMA), Quebec Asbestos Mining Assn. (QAMA), to which Defendant, any predecessor or any related company has belonged or in which any or all of the same have participated since 1925, and state the applicable dates of such membership or participation.

ANSWER TO INTERROGATORY 94.

Borg-Warner states that some of its employees are or were members of, or have attended seminars held by, various trade associations such as the American Society of Metals, the American Association of Mechanical Engineers, Society of Automotive Engineers, (Friction Subcommittee Transmission and Drivetrain Technical Committee), Asbestos Information