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IN THE CIRCUIT COURT OF THE THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

Plaintiff's Exhibit
S-BW-6

In Re: ALL ASBESTOS LITIGATION)
FILED BY THE SIMMONS FIRM, L.L.C.)

BORG-WARNER CORPORATION'S SUPPLEMENTAL RESPONSES TO DISCOVERY (INTERROGATORIES AND REQUEST FOR PRODUCTION)

Borg-Warner Corporation, now known as Burns International Services Corporation (hereinafter known as "Borg-Warner"), has made a good faith effort to respond to Plaintiff's Discovery to which it has not objected. In making such response, Borg-Warner does not purport to have adopted or applied any definition set forth at the onset of or at any other places in Plaintiff's Discovery nor has Borg-Warner assumed the improper, unproved and hypothetical facts or accepted the terminology or substance of Plaintiff's claims incorporated in, implied or alluded to within Plaintiff's Discovery.

1. Defendant, Borg-Warner, objects to Plaintiffs' definition of "asbestos products" as being overly broad, ambiguous, misleading and unlimited in scope. Therefore, without waiving this objection, due to the broad and diverse nature of Borg-Warner's operations and business, these answers are limited to BorgWarner Inc.'s knowledge of Borg-Warner's United States automotive operations for those divisions which, may have manufactured Borg-Warner disc brake, manual clutch or automatic transmission friction products.

2. Borg-Warner objects to Plaintiffs' Discovery on the grounds that it is overly broad, unduly burdensome, seeks information which is not relevant to Plaintiffs' cause of action, and seeks information which is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, and subject to any additional objections herein, Borg-Warner provides its Answers herein.

3. Borg-Warner objects to Plaintiffs' Discovery to the extent that said Discovery seeks information protected by either the attorney-client privilege or the work-product doctrine. Without waiving these objections, and subject to any additional objections herein, Borg-Warner provides its Answers herein.

4. Borg-Warner objects to Plaintiffs' Discovery to the extent that it seeks information that is not within the custody or control of Borg-Warner, is otherwise within the public domain, or is otherwise equally or more available to Plaintiffs than to Borg-Warner. Without waiving this objection, and subject to any additional objections herein, Borg-Warner provides its Answers herein.

5. Borg-Warner objects to Plaintiffs' Discovery to the extent that it asserts and/or assumes unproven conclusions as established facts. Without waiving this objection, and subject to any additional objections herein, Borg-Warner provides its Answers herein.

6. Borg-Warner objects to Plaintiffs' Discovery to the extent that it assumes the truth of the

allegations, which are in dispute in this litigation and/or makes incorrect and/or untrue assertions, and/or assumes unproven conclusions as established facts. Without waiving this objection, and subject to any additional objections herein, Borg-Warner provides its Answers herein.

7. Borg-Warner objects to Plaintiffs' Discovery to the extent it seeks information regarding Borg-Warner's sales of any asbestos-containing products to any entities other than those specifically identified as being in the chain of distribution of products to which Plaintiffs allegedly were exposed, or to any employers or job sites other than any employers or job locations that Plaintiffs specifically identified as employers and job locations at which Plaintiffs allegedly were exposed to asbestos-containing products. Without waiving this objection, and subject to any additional objections herein, Borg-Warner provides its Answers herein.

8. Borg-Warner objects to Plaintiffs' Discovery to the extent it requires Borg-Warner to identify any product either sold or manufactured by Borg-Warner which may have contained asbestos or components containing asbestos when: Plaintiffs have failed and/or refused to specifically identify any product either sold or manufactured by Borg-Warner to which Plaintiffs claim exposure; Plaintiffs have failed or refused to identify any locations and/or job sites at which Plaintiffs claim exposure to any products sold or manufactured by Borg-Warner; or Plaintiffs have failed or refused to identify any time periods during which Plaintiffs claim exposure to any products sold or manufactured by Borg-Warner. Without waiving this objection, and subject to any additional objections herein, Borg-Warner provides its Answers herein.

9. Borg-Warner objects to Plaintiffs' Discovery to the extent that it seeks to require it to provide information other than that which may be obtained through a reasonably diligent search of its records.

10. The responses made herein are made without in any way waiving or intending to waive, but on the contrary intending to reserve and reserving: (1) the right to object on the grounds of competency, privilege, relevancy and materiality, or any other proper ground, to the use of any such information, for any purpose, in whole or in part, in any subsequent step or proceeding in this action or any other action; and (2) the right to object on any and all grounds at any time, to any other discovery procedure involving or relating to the subject matter of Plaintiffs' Discovery.

Notwithstanding and without waiving these objections, Borg-Warner hereby responds to Plaintiffs' Discovery as follows:

INTERROGATORIES

INTERROGATORY NO. 1: Identify the person answering these interrogatories on behalf of Defendant.

ANSWER TO INTERROGATORY 1.

These answers prepared by counsel are based upon information collected by legal counsel through communications with many corporate employees over a period of several years. The

answers to these interrogatories are to be verified by William C. Cline, Vice President and Controller of BorgWarner Inc., formerly known as Borg-Warner Automotive, Inc., a former wholly owned subsidiary of Borg-Warner Corporation, now known as Burns International Services Corporation.

INTERROGATORY NO. 2: Has the person answering these interrogatories made reasonable inquiry of all available sources of information such that Plaintiff may rely upon these answers as the truthful and complete answers made on behalf of Defendant? List any and all such sources of information relied upon, including, but not limited to, identifying any and all records or documents reviewed and persons providing information.

ANSWER TO INTERROGATORY 2.

Yes, see also response to interrogatory 1.

INTERROGATORY NO. 3: State the following concerning this Defendant:

(a) Full and correct name;

(b) The form in which Defendant presently conducts business (i.e. corporation, partnership, proprietorship, etc.);

(c) Identify any and all predecessors and related companies as defined above;

(d) Any and all other forms in which defendant has conducted business at any time, and the date(s) when business was conducted in each form;

(e) Any and all names by which Defendant has been known or has conducted business, at any time, and the date(s) during which Defendant has been known by and/or conducted business, under each such name;

(f) Defendant's principal place of business,

(g) Defendant's present state of incorporation or state in which Defendant is registered as a partnership, association, etc., whichever is applicable; if Defendant has, at any time, been incorporated or registered in a different state, identify which state and when;

(h) Most recent date of incorporation or re-incorporation, and any and all prior date(s) of incorporation or re-incorporation;

(i) Whether this Defendant is authorized to transact business in the State of Illinois and, if so, the date such authority was first issued and last renewed;

(j) If this Defendant has an agent, representative or place of business in Illinois, identify such agent, representative, or place of business; and,

(e) Describe the nature of said study;

(f) Describe the nature of any action to eliminate or minimize inhalation of asbestos dust or asbestos fibers undertaken as a result of said study;

(g) Identify any and all documents referring to, relating to or reflecting said study or the results thereof; and,

(h) Identify any and all persons receiving a copy of any document referring to, relating to or reflecting the results or conclusions of said study.

ANSWER TO INTERROGATORY 62.

Not applicable.

INTERROGATORY NO. 63: Did Defendant, any related company, or any predecessor at any time, give to persons, who would be applying and/or removing any of the products listed in response to Interrogatory Nos. 19 and 42, any instructions or guidelines concerning precautions, warnings, procedures, and/or methods to use, in order to safely apply or remove such products? If so, describe such instructions, state to whom they were given, state the dates they were given, and describe the manner in which they were given.

ANSWER TO INTERROGATORY 63.

Borg-Warner answers that while the asbestos content within components of its products creates no health risk, a caution label was included for a short period on certain containers of manual clutch products at the request of a customer. The "caution" label is believed to have been initiated in 1986 for a brief period that year on asbestos-bearing manual clutch assemblies.

INTERROGATORY NO. 64: Did Defendant, any predecessor or any related company, at any time, place any warning signs or labels on the containers in which any of the products listed in response to Interrogatory Nos. 19 and 42 were packaged?

ANSWER TO INTERROGATORY 64.

See answer to interrogatory 63.

INTERROGATORY NO. 65: If your answer to Interrogatory No. 64 is "Yes," identify each and every product upon which such a warning was placed, and with respect to each such product identified:

(a) State the date on which any order directing that a warning be placed on said product first issued;

(b) Identify any and all persons participating in the decision to issue that

order;

(c) State the first date on which such warning was actually placed on said product;

(d) State the first date on which such product accompanied by such warning was first sold, distributed or installed;

(e) State the exact wording of this first warning;

(f) State the exact location and size of this first warning as it appeared on said product;

(g) Identify any and all persons who participated in any phase of the drafting or design of said first warning, including, but not limited to, those who performed the actual drafting and
design work, those who reviewed the work, those who edited the work and those who approved the warning;

(h) State why you placed such warning on said product, including, but not limited to, whether you placed such warning on said product because you received a directive, command, suggestion, legal opinion, or any type of communication (written or otherwise) from any person, firm, corporation, governmental agency, committee, association, attorney or institute; and

(i) Identify any and all documents referring to, relating to or reflecting, said warning, its drafting, and/or the decision to place the warning on said product, including, but not limited to, any communication as described in subpart (h) of this Interrogatory.

ANSWER TO INTERROGATORY 65.

See answer to interrogatory 63.

INTERROGATORY NO. 66: With respect to each product identified in response to Interrogatory No. 65 as having been accompanied by a warning, state whether, subsequent to the first warning described above, any different warning was ever placed upon said product. Any alteration, change or modification in the language, wording, capitalization, punctuation, style of type or printing, size, color, or location on the package or container, of the warning constitutes a different warning.

ANSWER TO INTERROGATORY 66.

None.

INTERROGATORY NO. 67: With respect to each different warning which accompanied each product listed in response to Interrogatory No. 65:

CAUTION

CONTAINS ASBESTOS
FIBERS. AVOID CREATING
DUST. BREATHING ASBESTOS
DUST MAY CAUSE SERIOUS
BODILY HARM.



PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing has been served upon the attorneys of record to the above cause by enclosing same in an envelope with postage prepaid, and depositing same in a United States mail box in Edwardsville, Illinois on 10-26, 2001.

BY: _____
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