

STATE OF NORTH DAKOTA

IN DISTRICT COURT

COUNTY OF BURLEIGH

SOUTH CENTRAL JUDICIAL DISTRICT

Ruben Biech
Kristi Kresge
Oscar Kroll
Luverne Wedwick

Civil No. 95-C-2162
95-C-2325
95-C-2166
95-C-2327

DEFENDANT BORG-WARNER CORPORATION'S ANSWERS
TO PLAINTIFFS' INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS TO DEFENDANT (SET I)

TO: ABOVE-NAMED PLAINTIFFS AND THEIR ATTORNEY, JEANETTE T.
BOECHLER, ONE N. 2ND STREET, STE 314, PO BOX 1932, FARGO, ND
58107

Though Borg-Warner Corporation has made every good faith effort to respond to those Interrogatories to which it has not objected, in making such response, Borg-Warner Corporation does not purport to have adopted or applied any definitions set forth at the outset of or at other places in Plaintiff's Interrogatories nor has Borg-Warner assumed the improper, unproved and hypothetical facts set forth, implied or alluded to in Plaintiff's Interrogatories or accepted those allegations of Plaintiff's claims or argumentative terminology or alluded to in those Interrogatories.

Defendant, Borg-Warner, objects to Plaintiff's definition of "asbestos products" as being overly broad, ambiguous, misleading and unlimited in scope. Therefore, without waiving this objection, Borg-Warner has responded to Plaintiff's Interrogatories only with regard to automotive or motor products to which Plaintiff is claiming exposure, i.e. brake and clutch products, only with regard to the Borg-Warner divisions which have manufactured or sold them and only with regard to U.S. operations.

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

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