PLAINTIFF'S EXHIBIT

MAR-32

STATE OF SOUTH CAROLINA COUNTY OF GREENVIILLE JAMES W. HENDERSON, JR. and BETTY LEE HENDERSON, wife, Plaintiffs, v. AC&S, INC., et al., Defendants.	In the Court of Common Pleas C/A No. 98-CP-23-2792 **MAREMONT'S RESPONSE TO PLAINTIFFS' REQUESTS FOR ADMISSION TO DEFENDANT Maremont/Nuturn/Ferodo**

PRELIMINARY STATEMENT

Maremont Corporation ("Defendant Maremont"), One Noblitt Plaza, Columbus, Indiana 47201, incorporated in the State of Delaware, is primarily engaged in the manufacture and distribution of automotive exhaust systems, shock absorbers, MacPherson struts and related hardware and parts.

On or about December 15, 1953, Maremont purchased the assets of a company in Paulding, Ohio known as Grizzly Manufacturing Company ("Grizzly"). Grizzly manufactured friction products, including brake linings, clutch facings and lined brake shoes. Maremont sold this division on or about June 30, 1977, to Nuturn Corporation, a wholly owned subsidiary of Turner and Newall, Ltd., except for a 20% interest, which was retained by Maremont. The remaining 20% interest was sold to Nuturn on or about April 23, 1982.

Soon after the purchase of Grizzly by Nuturn, Nuturn closed the Paulding facility and transferred the operation to a facility in Smithville, Tennessee. At this time, Maremont does not have in its employ any person or persons who previously worked at the Paulding facility. Furthermore, it appears that very few Maremont employees continued employment with Nuturn.

Very little documentation exists within Maremont concerning the Paulding, Ohio operation. Any documentation pertaining to the site that was not discarded by Nuturn upon its move to Smithville would presumably be under the custody and control of Nuturn Corporation, now known as Ferodo.

RESPONSES TO INDIVIDUAL REQUESTS

REQUEST FOR ADMISSION NO. 1

Admit or deny that all brake linings for cars manufactured prior to 1970 contained asbestos.

RESPONSE

Having conducted a reasonable and duly diligent search, Maremont states that the information available is insufficient to enable it to neither admit nor deny this request. Please see the Preliminary Statement that precedes these individual responses.

REQUEST FOR ADMISSION NO. 2

Admit or deny that all the brake linings for trucks used by James W. Henderson prior to 1970 contained asbestos.

RESPONSE

Having conducted a reasonable and duly diligent search, Maremont states that the information available is insufficient to enable it to neither admit nor deny this request. Please see the Preliminary Statement that precedes these individual responses.

REQUEST FOR ADMISSION NO. 3

Admit or deny that all asbestos-containing products emit respirable asbestos fibers when handled, touched, abraded, ground or banged.

RESPONSE

Maremont objects to this Request because it requires Defendant to make a medical and/or scientific conclusion, which Maremont is not qualified to make. Without waiving such objection, and having conducted a reasonable and duly diligent search, Maremont states that the information available is insufficient to enable it to neither admit nor deny this request. Please see the Preliminary Statement that precedes these individual responses.

REQUEST FOR ADMISSION NO. 4

Admit or deny that the respirable asbestos fibers that cause disease are usually invisible to the naked eye.

RESPONSE

Maremont objects to this Request because it requires Defendant to make a medical and/or scientific conclusion, which Maremont is not qualified to make. Without waiving such objection, and having conducted a reasonable and duly diligent search, Maremont states that the information available is insufficient to enable it to neither admit nor deny this request. Please see the Preliminary Statement that precedes these individual responses.

REQUEST FOR ADMISSION NO. 5

Admit or deny that even when no visible dust is created, asbestos-containing products are emitting respirable invisible dust.

RESPONSE

Maremont objects to this Request because it requires Defendant to make a medical and/or scientific conclusion, which Maremont is not qualified to make. Without waiving such objection, and having conducted a reasonable and duly diligent search, Maremont states that the information available is insufficient to enable it to neither admit nor deny this request. Please see the Preliminary Statement that precedes these individual responses.

REQUEST FOR ADMISSION NO. 6

Admit or deny that a person exposed to a level of .01 asbestos fibers per cubic centimeter of air of a length of 5 -IO microns for one day would inhale in excess of I 00,000 asbestos fibers in one day.

RESPONSE

Maremont objects to this Request because it requires Defendant to make a medical and/or scientific conclusion, which Maremont is not qualified to make. Without waiving such objection, and having conducted a reasonable and duly diligent search, Maremont states that the information available is insufficient to enable it to neither admit nor deny this request. Please see the Preliminary Statement

that precedes these individual responses.

REQUEST FOR ADMISSION NO. 7

Admit or deny that an exposure to asbestos fibers in length at .01 asbestos fibers per cubic centimeter of air would be invisible to the naked eye.

RESPONSE

Maremont objects to this Request because it requires Defendant to make a medical and/or scientific conclusion, which Maremont is not qualified to make. Without waiving such objection, and having conducted a reasonable and duly diligent search, Maremont states that the information available is insufficient to enable it to neither admit nor deny this request. Please see the Preliminary Statement that precedes these individual responses.

HOOD LAW FIRM, LLC
172 Meeting Street
P.O. Box 1508
Charleston, SC 29402
(843) 577-4435



Robert H. Hood
William O. Hanahan, III
David L. Harrell
C. Lucas Drake

April 9, 2001
Charleston, South Carolina

ROBERT H. HOOD
BARBARA WYNNE SHOWERS
(SC, TN, PA & NJ)
HUGH W. BUYCK
MARY AGNES HOOD CRAIG

ALLISON SNEAD PATRICK
ROBERT H. HOOD, JR.
(NC & SC)

OF COUNSEL
DEBORAH HARRISON SHEFFIELD

HOOD LAW FIRM, LLC

ATTORNEYS AT LAW

172 MEETING STREET
POST OFFICE BOX 1508
CHARLESTON SC 29401

(843) 577-4435
FAX: (843) 722-1630

E-MAIL: HLF@HOODLAW.COM

SARAH G. ANDERSON
(SC & NY)
WILLIAM O. HANAHAN, III
DAVID W. OVERSTREET
DAVID L. HARRELL
C. LUCAS DRAKE
SALLY RENTIERS YOUNG
MARK A. CRAWFORD
(SC & GA)
CHILTON E. GRACE
D. NATHAN HUGHEY
J. BLANTON O'NEAL, IV
DARREN K. SANDERS
PAUL E. SPERRY
REESE R. BOYD, III

DIRECT DIAL:

(843) 577-1225

EMAIL:

david_harrell@hoodlaw.com

April 6, 2001

Richard J. Lutzel, Esquire
WALLACE & GRAHAM, P.A.
525 North Main Street
Salisbury, NC 28144

Re: *SC/James Henderson v. AC&S, Inc., et al*
C/A No. 98-CP-23-2792
Our File No. 40091.45
CCR No. 9711107357

Dear Rick:

Enclosed please find Maremont's Response to your Request for Admissions in the above-referenced matter.

Kind regards,

Yours truly,

David L. Harrell

DLH/eab

cc: All Defense Counsel

Asbpi/sc/letters/L-Lutzel (Maremont RRTA)