

See Answer to Interrogatory No. 98, which is incorporated herein as if fully rewritten.

Defendant is aware that one employee (currently a Buyer employee) or perhaps more than one former Warner Electric employees were in possession of papers from the Society of Automotive Engineers regarding a variety of topics, some of which related to asbestos.

INTERROGATORY NO. 100:

Identify any and all documents including, but not limited to, minutes, bulletins or reports, [that were, between 1930 and 1980] received by, or on behalf of, any trade organization, association or entity listed in response to Interrogatory No. 94 and/or 97, or any committee, subcommittee or subgroup thereof;

- (a) which refer to, relate to or reflect the subject of asbestos;
- (b) which refer to, relate to or reflect a relationship between asbestos exposure and any disease; or
- (c) which refer to, relate to or reflect the placement or providing of warnings with respect to hazardous products.

ANSWER:

See Answer to Interrogatory No. 99, which is incorporated herein as if fully rewritten.

INTERROGATORY NO. 101:

Identify any and all agreements [entered between 1930 and 1980], oral or written, between or among Defendant, any of the other defendants in this lawsuit, any organization, association or other entity including, but not limited to, those identified in your Answer to Interrogatory No. 94 and/or any medical or scientific foundations, relating to the standardization of: