

Motor Company, General Motors Corporation and Daimler Chrysler Corporation or their predecessors from the early 1950s until 1983?

ANSWER: While Borg-Warner manufactured asbestos-containing automatic transmission friction plates from the early 1950s through 1983, it is not clear when crocidolite asbestos was first introduced into the formula. A number of the friction plates did not contain asbestos and others did not include crocidolite asbestos. The composition would depend upon the particular application and time period and the occasions on which each product was used is not well-documented. Sales of the friction plates including those which contained crocidolite asbestos, were made at certain times during the period from the early 1950s until 1983 to Ford Motor Company, General Motors Corporation and the predecessor to DaimlerChrysler.

INTERROGATORY NO. 3:

Are these sworn interrogatories made by an officer, a partner, or agent of the defendant who furnishes such information as is available to the party?

ANSWER: Yes; this information was supplied by Anthony Grzesiak.

INTERROGATORY NO. 4:

Identify the person verifying these answers on behalf of the defendant.

ANSWER: These interrogatories will be verified by William Cline.

SIMMONSCOOPER, LLC

Ted N. Gianaris, #6237156
707 Berkshire Blvd., P.O. Box 521
East Alton, IL 62024
(618) 259-2222