

*Automotive Parts Division*

*11045 Gage Avenue*

*Franklin Park, IL*

*(1965-1981)*

*and*

*1130 S. Canal Street and 6 North Michigan Ave*

*Chicago, IL*

*(1965)*

INTERROGATORY NO. 6

For each facility identified in your Answer to Interrogatory No. 5, identify all officers, employees or agents (corporate level or plant level) employed by you or any predecessor/related entity from 1920 to date in a management or upper-level supervisory position (including upper-level assistants or associates) having responsibility in the following areas, and identify the dates which each person served in the following capacities:

- (a) occupational health or safety;
- (b) construction health or safety;
- (c) compliance with federal, state, or local safety regulations (including but not limited to OSHA);
- (d) compliance with federal, state, or local environmental regulations;
- (e) compliance with federal, state, or local health regulations (including but not limited to OSHA);
- (f) industrial hygiene;
- (g) insurance or risk management;
- (h) worker's compensation; medical director,
- (i) physician, nurse, health technician;
- (j) personnel/human resources;
- (k) the manufacture, sale, distribution, purchase, possession, application, installation, or use of asbestos (including raw asbestos) or asbestos-containing products/materials;
- (l) purchasing of supplies, tools, equipment; and
- (m) the design, or preparation of manufacturing specifications for asbestos-containing products/materials.

ANSWER TO INTERROGATORY NO. 6:

*Borg-Warner objects to this Interrogatory as overly broad and burdensome, dealing with extensive and varied operations covering a broad period of time.*