

IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

IN RE: **ALL MADISON COUNTY ASBESTOS LITIGATION
FILED BY THE O'BRIEN LAW FIRM**

**BORG-WARNER CORPORATION BY ITS SUCCESSOR
IN INTEREST RESPONSES TO PLAINTIFF'S SECOND
REQUEST FOR PRODUCTION OF DOCUMENTS**

Borg-Warner Corporation (hereinafter referred to as "Borg-Warner") does not currently exist, nor is its successor engaged in the manufacture or sale of asbestos-containing automotive products. A good faith effort has been made to responsively address plaintiffs' discovery to which objections have not otherwise been filed. For this reason, BorgWarner Inc., an entity familiar with the prior automotive operations of Borg-Warner Corporation, has assisted in the preparation of responses to this discovery on behalf of the Defendant, relying upon information collected from various sources, including information recently identified. Defendant's exploration of its prior operations is continuing and these responses amend and supersede any previously filed responses to discovery in this and any other jurisdiction. Defendant does not purport to have adopted or applied any definitions set forth at the outset of or at other places in plaintiffs' discovery nor has it assumed the improper, unproved and hypothetical facts or accepted the terminology or substance of plaintiffs' claims incorporated in, implied or alluded to within this discovery.

In an effort to expand its previous responses to discovery of Borg-Warner's United States automotive operations these answers address the manufacture and sale of Borg-Warner clutch materials for automatic transmissions.

General Objections

1. Borg-Warner objects to Plaintiffs' Discovery on the grounds that it is overly broad, unduly burdensome, seeks information which is not relevant to Plaintiffs' cause of action, and seeks information which is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, and subject to any additional objections herein, Borg-Warner provides its Answers herein.