

reviewed contain information responsive to this request. The appropriations are labeled Warner SBC-12-000001-002948.

REQUEST NO. 14:

Any and all writings or documents of any nature whatsoever referring, reflecting, concerning or relating to any way the employment since 1930 of any industrial hygienist, toxicologist or other persons in similar positions by this Defendant, any predecessor or related companies. Specifically included within the scope of this request are any and all writings or documents of any nature whatsoever for any individuals or entities employed in the positions identified above whether it be in a traditional employee-employer relationship or that of an independent contractor.

RESPONSE:

See Answers to Interrogatory Nos. 47 and 48 in Dana Corporation's Supplemental Answers and Objections to Plaintiffs' Interrogatories Regarding Warner Electric Brake & Clutch Company Pursuant to Order Dated October 20, 2003. Documents responsive to this Request have been produced in response to Request for Production No. 9 and potentially for one or more other Requests.

REQUEST NO. 15:

A bibliography of any and all material contained in any and all libraries or other information depositories of this Defendant, any predecessor or related companies, referring,