

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein by reference. Further objecting, the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence as it relates to this defendant.

Subject to and without waiving objections, Dana states that during its early history Victor belonged to the Society of Automotive Engineers, the American Society for Testing and Materials and the American Chemical Society. In 1985, Victor became an associate member of the Asbestos Information Association. Later, Victor joined the Gasket Fabricators Association and the Asbestos Free Gasket Group. Generally, the written materials the company received would have been in the form of newsletters. To the extent that documents would have been maintained from these organizations, they would be maintained at Victor's facilities in Illinois.

15. WORKMEN COMPENSATION CLAIMS

Have you had any claims of employees alleging injury due to asbestos exposure? If so, state:

- A. The date the claim was filed;
- B. The type and description of the injury claimed;
- C. The name of the claimant;
- D. The disposition of the claim;
- E. Identify and produce all documents relating to each workmen compensation claim.

ANSWER:

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Respectfully submitted,



Counsel for Defendant
Dana Corporation