

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. In approximately the 1980s, Defendant sold Victor Products Division gasket material through a sales representative agency named Distribution Management Associates or Joyce-Roger, Inc., which in turn sold Victor Products Division gasket material in Texas through sales representative Ken Kubecka, who was located in or near Houston, Texas.

INTERROGATORY NO. 18:

List each employee (including only physicians and/or hygienists) who has acted in a medical advisory capacity to your company at any time during the past 40 years, including, but not limited to, physicians and industrial hygienists, and the current address, telephone number and job title of each of those individuals and who has, had or may have had any knowledge regarding the hazards of asbestos.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Defendant did not have a medical department or an industrial hygiene department as such. Individual plants did have access to medical services. Dana has a research department whose responsibility it is and was to perform research and testing to verify performance characteristics of its products and compliance with customer specifications. It also had employees whose responsibility it was to promote employee safety and industrial hygiene. In addition, it had employees who were responsible for administering respirator programs and ensuring that the plants were properly maintained to minimize dust levels. Dana's investigation of this matter continues.