

subject matter of the pending action nor reasonably calculated to lead to the discovery of admissible evidence as it relates to Dana.

4. Defendant objects to each interrogatory and part thereof to the extent that it seeks information not within the custody and control of Dana.

5. Defendant objects to each interrogatory and part thereof to the extent that it seeks to require answers or information, or require identification of documents, or impose obligations, beyond those permitted by the applicable rules of Civil Procedure and local rules of Court.

6. Defendant objects to each interrogatory and part thereof to the extent that it seeks information in a form different from that maintained by Dana in the ordinary course of its business.

7. Defendant objects to each interrogatory and part thereof to the extent that it seeks information concerning or contained in documents which it objects to producing.

8. Defendant objects to each interrogatory and part thereof to the extent that it seeks to impose on defendant a discovery obligation to respond for defendant's businesses and entities not parties to this litigation. Defendant responds to these interrogatories on behalf of itself with information known to it about Smith & Kanzler Company and that company's product known as SprayCraft. Defendant does not respond for other companies that plaintiff may consider to be "subsidiaries" or "affiliates" of defendant but which are not defendant's. Dana was incorporated under the name Spicer Manufacturing Corporation. The corporation changed its name in 1946 to Dana Corporation. There is no