

IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

12/16/03
Rose
Bill

IN RE: ALL ASBESTOS LITIGATION)
FILED BY THE SIMMONS FIRM, LLC,) DANA CORPORATION'S RESPONSES
) TO PLAINTIFFS' STANDARD
Plaintiffs,) INTERROGATORIES REGARDING
) SPICER AXLE PRODUCT DIVISIONS
vs.) PURSUANT TO ORDER DATED
) OCTOBER 20, 2003
A.W. CHESTERTON, *et al.*,)
)
Defendants.)

PRELIMINARY STATEMENT

Pursuant to the consent order dated October 20, 2003, Dana Corporation ("Defendant") hereby submits these Responses To Plaintiffs' Standard Interrogatories with respect to the Spicer Axle Product Divisions. This preliminary statement applies to and is incorporated into each response. In addition, in order to avoid confusion, Defendant has incorporated below the changes to the interrogatories ordered by the Court on April 14, 2000, and provides responses to the interrogatories as so modified.

Defendant responds to these interrogatories after reasonable investigation with the best available information presently known to it about the Spicer axle product line. In some cases, Defendant is not aware of any individuals with personal knowledge of relevant information covering early years of axle manufacturing. Moreover, the documents available to Defendant do not provide all of the information sought. Accordingly, Defendant will respond only to the extent that there is information currently available and reviewed that it believes is sufficient to respond, in whole or in part, to the interrogatory. Unless otherwise requested in the interrogatory, these responses are limited to U.S.A. manufacturing and sales. To the extent Defendant manufactured or sold products that were not part of the Spicer Axle historical product lines, those products will be addressed separately as otherwise required by the October 20, 2003 order.

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