

also permitted access to certain Buyer employees. Dana's responses are principally based upon information within Buyer's possession, custody and control.

Defendant is producing copies of documents, mostly copies of documents located now at Buyer facilities, that it believes are responsive to Plaintiffs' requests for production. Many documents, however, do not reveal whether the product at issue contained asbestos. With few exceptions, neither Warner Electric Brake & Clutch Company nor the Warner Electric Division of Dana segregated or identified documents based on whether the document related to asbestos. Therefore, the documents produced may include documents that relate to non-asbestos products.

To the extent Defendant has produced a document responsive to one request that may be responsive to other requests, multiple copies of the same document were not separately produced or identified.

Substantial progress has been made locating documents requested by Plaintiffs. However, Defendant has not completed its review of potentially relevant documents found at Buyer's facilities. Defendant will supplement this response once it has completed its review. These responses are limited to documents located in the United States.

Defendant reserves the right to amend, supplement, modify or otherwise change these responses in the event that it acquires additional information responsive to these requests for production, or if it appears that inadvertent or administrative omissions or errors have been made.