

22. Physician/Consultant

Please state whether or not Defendant ever employed, engaged or retained any physician as a consultant, plant physician or otherwise (excluding experts retained during the course of litigation), in connection with asbestos-related business activities. If so, please state the following as to each such physician:

- A. Identify the physician and give complete dates and places of employment or service;
- B. State the physician's duties and responsibilities;
- C. Identify the company person to whom the physician reported;
- D. State the purpose for which the physician was employed, engaged or retained; and,
- E. State whether documents pertaining to the physician's professional activities involving asbestos and/or individuals exposed to asbestos exist and the custodian of said documents.

RESPONSE TO MASTER INTERROGATORY 22:

See Preliminary Statement and General Objections.

Further objecting, this interrogatory is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to, and without waiving objections, Dana states it has a decentralized structure with no chief medical officer. Dana has various divisions and the responsibility for ensuring compliance with applicable health and safety rules and regulations resides with each plant manager.

Dana does, and has, a nurse at one or more plants primarily to render first aid when necessary. In addition, Dana has, since 1980, maintained an x-ray program for employees who worked with asbestos at Victor plants in Illinois. These functions are performed under the auspicious of the personnel department.