

INTERROGATORY NO. 44:

Was it a foreseeable use of your asbestos-containing products that they may have been removed, stripped, or replaced at some time after installation?

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, Defendant anticipated that its products had various useful lives, depending on the type of product. Maintenance, therefore, was contemplated and would involve some removal and/or replacement. Investigation of this matter continues.

INTERROGATORY NO. 45:

Before 1970, did you or your subsidiaries or predecessor(s) ever arrange for any labor inspectors, insurance company inspectors or anyone from your company to go to job sites where your products were being used or installed to make or take dust level counts? If so, state when this procedure started, the purpose of such procedures, and all results of such procedures.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, Dana does not presently believe that, before 1970, Victor Products Division ever arranged for any labor inspectors, insurance company inspectors or anyone from Victor Products Division to go to job sites where Victor Products Division products were being used or installed to make or take dust level counts.

INTERROGATORY NO. 46:

If Defendant performed or had performed any dust level counts, what action, based on the results, did your company take?