

REQUEST FOR ADMISSION NO. 9:

Admit that Dana Corporation, through its Victor Products Division, sold asbestos containing gaskets from 1967 until June of 1988.

RESPONSE:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, Defendant admits that Victor Products Division sold gaskets, some of which contained asbestos, from 1967 until June 1988. After it ceased to manufacture gaskets with asbestos, Victor Products Division continued, for a short time, to sell its limited inventory of gaskets that contained asbestos to the distribution center of Dana's Warehouse Operations Division. The last such known sale was in 1990. The Distribution Center sold a limited number of gaskets with asbestos that were manufactured by others until some time in the 1990s.

REQUEST FOR ADMISSION NO. 10:

Admit that Dana Corporation, through its Victor Products Division, manufactured asbestos containing gasket material from 1967 until June of 1988.

RESPONSE:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, Defendant admits that Victor Products Division manufactured gasket material, some of which contained asbestos, from 1967 until June 1988.