

Company was not merged with Dana. Defendant denies that it is liable for products manufactured by the dissolved company.

In 1967, Defendant formed the Victor Gasket Division, which manufactured and marketed gaskets and gasket materials. In 1985, Victor Gasket Division became Victor Products Division. In 1993, the name of this division was changed to the Victor Reinz Division.

In 1993, Defendant acquired a wholly-owned subsidiary named Reinz Wisconsin Gasket Co., which manufactured and marketed gaskets from gasket materials made by others.

INTERROGATORY NO. 41:

Was each of your asbestos products generally expected to reach, or packaged to reach, the consumer or user, without substantial change in the condition in which it was sold? If not, with respect to any such product, explain in what way the Defendant claims its products were altered or substantially changed after sale or distribution and before reaching the user.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, Victor Products Division gaskets were generally expected to reach, or packaged to reach, the consumer or user, without substantial change in the condition in which they were sold.

INTERROGATORY NO. 42:

For each asbestos-containing product identified in response to Interrogatory No. 6, identify all foreseeable users such as insulators, helpers, pipefitters, welders, machinists, plasterers, drywall finishers, carpenters, boilermakers, shipwrights and riggers, etc. of any of Defendant's asbestos-containing products.