Therefore, Dana strictly limits its answers to Dana's brief relationship with Smith & Kanzler Company, which relationship is described below. Dana objects to providing the voluminous information requested in these interrogatories for its automotive, vehicular and industrial products because they are not the type of products to which the plaintiff alleges exposure. Questions about Dana's vehicular products are not relevant and are not calculated to lead to the discovery of relevant and admissible information. Further, because Dana merely owned the stock of Smith & Kanzler Company for less than eighteen (18) months, Dana denies that it has any liability for any products manufactured or sold by Smith & Kanzler Company.

From September, 1967 until February, 1969, Dana owned the stock of a New Jersey corporation known as Smith & Kanzler Company, located in Linden, New Jersey. Smith & Kanzler Company produced certain asbestos containing products that had application in the building construction industry. Dana did not incorporate Smith & Kanzler Company but came to own its stock as a consequence of the dissolution of Victor Manufacturing & Gasket Company in September, 1967. Victor was at that time the sole shareholder of Smith & Kanzler Company's stock. In February, 1969 less than eighteen (18) months after acquiring the stock, Dana sold the stock of Smith & Kanzler Company to Philip Carey Corporation. At that time Philip Carey took possession of Smith & Kanzler Company's business records or those records remained with Smith & Kanzler Company. Dana has located very few of Smith & Kanzler Company's records that remained in its possession after the sale.