

sufficient that the documents requested be produced for the first ten worker compensation claims filed and the first ten lawsuits filed.

RESPONSE:

See Answer to Interrogatory No. 89 in Dana Corporation's Supplemental Answers and Objections to Plaintiffs' Interrogatories Regarding Warner Electric Brake & Clutch Company Pursuant to Order Dated October 20, 2003. Except for the pending workers compensation claim, Defendant is not aware of any workers compensation claims. Defendant objects to producing a pending claim file. Defendant is not aware of law suits filed against Warner Electric Brake & Clutch Company resulting from exposure to asbestos. Defendant does not keep permanent records by product for early cases in which Defendant was sued. Defendant was defended by the Center for Claims Resolution from the Center's inception until February 2001. Since February 2001, in nearly all cases where a product is identified, the product is a Victor Products Division gasket.

REQUEST NO. 12:

Any and all writings of any nature whatsoever sent to or received from any of the Defendant's insurance carriers and/or the carriers of the Defendant's predecessor or related companies, referring, reflecting, concerning or relating to any way the health effects of the absorption or inhalation of asbestos dust or asbestos particles suspended in the air, including but not limited to the health effects of the absorption or inhalation of asbestos dust and/or asbestos particles suspended in the air on employees of the Defendant, any predecessor or related