

neither relevant to the subject matter of the pending action nor reasonably calculated to lead to the discovery of admissible evidence as it relates to Dana. Subject to and without waiving objections, Dana does not know whether any employee or agent of Smith & Kanzler Company ever received a copy of any of the articles listed in Interrogatory No. 21.

INTERROGATORY NO. 22:

Has Defendant ever conducted any tests or studies concerning the effects of the inhalation of asbestos dust or fibers on the animal or human respiratory system? If so, provide the name, date, and location of each test or study and state by whom in the corporation the report of the results was received.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Further objecting, the interrogatory is overly broad given the parameters and subject matter of this case. Further objecting, the information sought is neither relevant to the subject matter of the pending action nor reasonably calculated to lead to the discovery of admissible evidence as it relates to Dana. Subject to and without waiving objections, Dana does not know whether Smith & Kanzler Company ever conducted any tests or studies concerning the effects of the inhalation of asbestos dust or fibers on the animal or human respiratory system.

INTERROGATORY NO. 23:

Has Defendant ever litigated the issue of insurance coverage in a case involving exposure to asbestos? If so, for each case state:

- (a) the names of the parties, the court, and the case number;
- (b) the filing date;
- (c) the name and address of the attorneys representing the insurance carrier; and
- (d) whether the case has been settled.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Further objecting, the interrogatory is overly broad given the parameters and subject matter of this case. Further objecting, the information sought is neither relevant to the subject matter of the pending action nor reasonably calculated to lead to the discovery of admissible evidence as it relates to Dana. Subject to and without waiving objections, Dana does not know whether Smith & Kanzler Company has