

38. Advertisement

If you advertised any of your asbestos-containing products, listed in response to interrogatory 14, in newspapers, magazines, or other publications at any time from 1930 to the present, please state for each such advertisement that contained a warning regarding your products:

- A. The name of the publication in which it appeared, including the date and page number;
- B. A complete transcript of the advertisement and a description of any pictures accompanying it;
- C. The name and address of the person or agency that was responsible for approving each such advertisement;
- D. The name and address of whoever has current custody of the above-described advertising literature; and,
- E. Identify all documents relating to such advertisements and the custodian thereof.

RESPONSE TO MASTER INTERROGATORY 38:

See Preliminary Statement and General Objections.

Further objecting, this interrogatory is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving objections, Dana will provide information known to it if the specific Victor product is identified.