

IN THE CIRCUIT COURT FOR
DADE COUNTY, FLORIDA
11TH CIRCUIT

IN RE CONSOLIDATED ASBESTOS CASES) CASE NO. 91-80,000(42)
)
) AMENDED ANSWERS OF DANA
) CORPORATION TO PLAINTIFFS' MASTER
) PRELIMINARY INTERROGATORIES AND
) REQUESTS FOR PRODUCTION
)
)

PRELIMINARY STATEMENT

Dana Corporation (Dana) is a multinational corporation with thousands of employees at hundreds of plants and facilities across the country and around the world. Dana manufactures a variety of industrial and vehicular products for original equipment manufacturers and for the aftermarket. In view of Dana's size, it would be practically impossible to inquire at every Dana plant and facility to answer these interrogatories. Necessarily, Dana must narrow the scope of its inquiry based upon the allegations of the complaints and the product that appears to be at issue.

To the extent Dana can determine from the Complaints, it is apparently contended that the plaintiffs were exposed to asbestos-containing products allegedly manufactured by the Victor Product.