

ANSWER:

See Answer to Interrogatory No. , which is incorporated herein as if fully rewritten.

INTERROGATORY NO. 51:

Did your company or its predecessor(s) or subsidiaries ever stamp or place the name of the company, its initials, or any identifying logo on any of its asbestos-containing products? If so, please state the name brand names of such products, a description of such stamp or logo and the dates such were placed on the referred products.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. If plaintiffs identify an asbestos-containing Victor gasket to which they claim exposure, Dana may be able to provide information requested about that product.

INTERROGATORY NO. 52:

Has your company, or your predecessor(s) or subsidiaries, ever devised a research plan to develop, or actually developed or had developed, a product which did not contain asbestos and which could be substituted for one or more of your asbestos-containing products? If so, state the date that such research plan was begun and when such asbestos-free product was first placed on the market.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Without the identification of a specific gasket product, defendant is not able to reasonably respond to the entirety of this interrogatory. If plaintiffs identify an asbestos-containing product to which they claim exposure, defendant will provide available information requested about the product. Subject to and without waiving objections, Victor Products Division has manufactured gaskets without asbestos since its inception in 1967. Victor Products Division started the process