Company distributed, sold or placed its products into the stream of commerce any tests were conducted to determine potential health hazards involved in the use of, or exposure to, the materials contained in those products.

INTERROGATORY NO. 9:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the testing of the products referred to in Interrogatory No. 6 now exist? If so, state:

(a) A description of each such document.

(b) The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER:

See response to Interrogatories Nos. 6 and 7 which are incorporated herein as if fully rewritten.

INTERROGATORY NO. 10:

Did Defendant or any of its predecessor or subsidiary companies make any design changes or modifications as a result of those tests described in responses to Interrogatory No. 8? If the answer is affirmative, state:

(a) The trade names of the products changed.

(b) The nature of the changes made and the date of such changes or modifications.

(c) The name, address, and job title of each person responsible for having caused a change to be made, or having made a change or modification.

ANSWER:

See response to Interrogatory No. 8, which is incorporated herein as if fully rewritten. Subject to and without waiving objections, Dana does not know whether there have been any changes in the formula for SprayCraft.