

REQUEST NO. 21:

Any and all writings or documents of any nature whatsoever referring, reflecting, concerning or relating in any way whatsoever any health surveillance program conducted by or on behalf of this Defendant, any predecessor or related companies, or its employees.

RESPONSE:

See Answer to Interrogatory No. 84 in Dana Corporation's Supplemental Answers and Objections to Plaintiffs' Interrogatories Regarding Warner Electric Brake & Clutch Company Pursuant to Order Dated October 20, 2003. Documents responsive to this Request have been produced in response to Request for Production Nos. 5 and 9 potentially for one or more other Requests.

REQUEST NO. 22:

All 10-K forms which this Defendant, including all subsidiaries, divisions, predecessor entities or related companies, has submitted to the securities exchange commission, and all annual stockholder reports for the last ten years.

RESPONSE:

Defendant currently has not reviewed Warner Electric Brake & Clutch Company's 10-K's, if any exist. Defendant's annual reports, which contain detailed financial information, are publicly available. Defendant's 10-K forms are located on the Securities & Exchange Commission's website.