

INTERROGATORIES

INTERROGATORY NO. 1:

State the name, address job title, length of time employed by Defendant, and a year-by-year list of all other positions, titles, or jobs held when working for Defendant of each person who has supplied any information used in answering these interrogatories.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, Mark G. Hess, in-house counsel for Dana Corporation supplied the information used in answering these interrogatories. It is not possible to identify each person who may have supplied information to Mr. Hess. Mr. Hess acquired his knowledge during the years he served in his position as in-house counsel to Dana and his review of numerous records in the ordinary course of business.

INTERROGATORY NO. 2:

State whether or not you are a corporation. If so, state your correct corporate name, the state of your incorporation, the address of your principal place of business, the name and address of the person or entity authorized to accept service of process on your behalf, and whether or not you have ever held a Certificate of Authority to do business in the State of Texas.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Further objecting, the interrogatory is overly broad given the parameters and subject matter of this case. Further objecting, the information sought is neither relevant to the subject matter of the pending action nor reasonably calculated to lead to the discovery of admissible evidence as it relates to Dana. Subject to and without waiving objections, Dana Corporation was incorporated in the State of Virginia in 1916 under the name Spicer Manufacturing Corporation. In 1946, the corporation changed its name to Dana Corporation. Its principal place of business is in Toledo, Ohio. C.T. Corporation is authorized to accept service of process on Dana's behalf. Dana has held a Certificate of Authority to do business in the State of Texas. Smith & Kanzler Company from September, 1967 until February, 1969, was a New Jersey Corporation, located in Linden, New Jersey. Dana does not know the person or entity, if any, authorized to accept service of process on Smith & Kanzler Company's behalf. Dana does not know whether Smith & Kanzler Company ever held a Certificate of Authority to do business in the State of Texas.