

Any and all writings or documents of any nature whatsoever, referring, reflecting, concerning or relating to in any way any policies of insurance, including but not limited to, worker's compensation, medical and/or life insurance, that the Defendants, any predecessor or related companies, carried on its employees during the period 1940 to date.

RESPONSE:

See Answers to Interrogatory Nos. 125 and 126 in Dana Corporation's Supplemental Answers and Objections to Plaintiffs' Interrogatories Regarding Warner Electric Brake & Clutch Company Pursuant to Order Dated October 20, 2003. This request for production is overly broad and unduly burdensome because Plaintiffs have not identified a particular product or dates and extent of exposure to that product. Defendant further objects to responding to this request for production and relies upon the privilege between an insurer and insured in discussions regarding the defense of any claim or category of claims. Subject to and without waiving objections, available documents responsive to this request will be made available for review upon execution of a Confidentiality Agreement.

REQUEST NO. 25:

Any and all policies of insurance which may provide coverage for this Defendant, any predecessor or related companies, against the claims asserted in Plaintiffs complaint.

RESPONSE:

See Answers to Interrogatory Nos. 125 and 126 in Dana Corporation's Supplemental Answers and Objections to Plaintiffs' Interrogatories Regarding Warner Electric Brake & Clutch