



CAUSE NO. 96-333

IN RE: ASBESTOS LITIGATION

IN THE DISTRICT COURTS AND
COUNTY COURTS AT LAW
OF EL PASO COUNTY, TEXAS

**DEFENDANT DANA CORPORATION'S ANSWERS TO
PLAINTIFFS' MASTER INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS**

PRELIMINARY STATEMENT

These interrogatories and requests for production seek information about events that occurred many years ago. These responses are based upon a reasonable investigation into the relevant facts and information currently known to Dana.

Because the pending litigation against Defendant appears to involve an allegation of exposure to Victor Products Division gaskets, Defendant responds to these interrogatories and requests for production at this time for the Victor Products Division (now the Victor Reinz Division), excluding Reinz Wisconsin Gasket Co., for the period 1967 to date. Dana is not able to respond to questions that relate to Victor Manufacturing and Gasket Company in all circumstances. In those instances where Dana has information for Victor Manufacturing and Gasket Company that it believes to be accurate, Dana will attempt to provide that information. If plaintiffs provide information of alleged exposure to specific Dana products not encompassed by these responses, Dana will investigate further and may supplement these responses.

In 1966 Dana Corporation acquired 100% of the stock an Illinois corporation known as Victor Manufacturing & Gasket Company, incorporated in Chicago, Illinois. In 1967, Victor Manufacturing & Gasket Company was dissolved pursuant to and in conformity with relevant