

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, much of the information sought by these interrogatories has been accumulated over time but not necessarily for purposes of responding to these interrogatories. It is not possible to now identify each person who, at some time, may have provided information that is now being used to answer these interrogatories. No single employee, officer or agent of the company has direct knowledge of the documents and information necessary to supply each and every answer. Gary Austin, Plant Manager, Victor Reinz Division, verified the answers to these interrogatories.

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. 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.

INTERROGATORY NO. 3: