

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. If plaintiffs identify an asbestos-containing Victor gasket to which they claim exposure, Dana will investigate further and may be able to provide information requested about the product. Subject to and without waiving objections, Victor Products Division labeled some of its products for some period of time with "Victor" or "Victopac." Dana does not know whether Smith & Kanzler Company ever stamped or imprinted its name, its initials, or any identifying logo or design on its asbestos-containing product.

INTERROGATORY NO. 23:

If you have discontinued manufacturing, distributing, or selling asbestos-containing products, please give the date that you discontinued such activity and state the reason(s) therefore.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, Victor Products Division has manufactured products without asbestos since its inception in 1967. Victor Products Division started the process of removing asbestos from the gaskets that did contain asbestos no later than the early 1980s. Raw asbestos was no longer used as an added ingredient in the manufacture of gaskets after June 1988. Dana believes that Smith & Kanzler Company discontinued business, but does not know the exact date.

INTERROGATORY NO. 24:

When did you first become aware that unprotected exposure to, or inhalation of, airborne asbestos dust and fibers could cause illness or disease of any kind?

- a. state what illnesses and/or diseases you discovered could be caused, precipitated, or aggravated by such exposure;
- b. state the specific date you acquired awareness of each disease entity or illness and its foreseeable relationship to such exposure;
- c. explain fully how you obtained this information, including the source of any such information (i.e., medical articles, scientific papers, journals, independent research, warnings, etc...)
- d. identify any all papers, documents and materials in your possession which relate in any way to your knowledge of the hazards of breathing dust containing asbestos fibers; and
- e. identify the custodian(s) of all such papers, documents or materials.