Division of Dana Corporation "Victor". Victor manufactures, inter alia, gaskets. Dana strictly limits these responses to those products and that division. Further, if the plaintiffs provide more specific information about the alleged exposure, it may be possible that more specific responses can be provided to these interrogatories.

These responses are provided with the above qualifications and Dana's responses are expressly limited as noted above. To the extent these interrogatories attempt to impose an obligation upon Dana to respond on behalf of or with information in the possession of persons, businesses or entities that are not parties to this lawsuit, Dana objects to such interrogatories. Further, these interrogatories seek information about events that allegedly occurred since 1920. These responses are based upon a reasonable investigation into the relevant facts and are as accurate as possible understanding that in the intervening years persons who may have had knowledge of the relevant facts may have died, left the employ of the company or simply forgotten events of so long ago. Dana reserves its right to modify or supplement its responses upon the discovery of new, additional or different information.

GENERAL OBJECTIONS

1. Defendant objects to each interrogatory and part thereof to the extent that plaintiffs may assert that plaintiffs' definitions for words are binding on defendant or purport to impose upon defendant obligations beyond those imposed by the Rules of Civil Procedure.