

and some clutches were non-asbestos containing. The assets of Lipe Corporation were sold to an unrelated entity, Haldex, Inc., on April 3, 1998.

Pursuant to an Agreement and Plan of Merger, dated May 3, 1998, between Dana Corporation, Echo Acquisition Corp., and Echlin, Inc., Dana acquired the outstanding stock of Echlin, Inc. Upon this stock acquisition, Echo Acquisition Corp., a wholly owned subsidiary of Dana, was merged with and into Echlin, Inc. Echlin, Inc. was the surviving corporation and became a wholly owned subsidiary of Dana Corporation.

At the present time, Lipe Corporation is owned 95% by Dana Global Holdings, Inc. and 5% by Dana International Holdings, Inc. Dana International Holdings, Inc. is a wholly owned subsidiary of Dana Global Holdings, Inc., which is a wholly owned subsidiary of Dana Corporation.

Historically, Lipe manufactured and remanufactured clutches for medium and heavy duty trucks (classes 6, 7 and 8). In addition, for a short period of time beginning in approximately October 1985, and ending at the end of 1986, Lipe sold and distributed heavy duty brake block, some of which contained asbestos, which was manufactured by Brake Systems, Inc. This brake block carried the trade name "Grey-Rock." Any asbestos utilized in Lipe clutches or Grey-Rock brake block was encapsulated or bonded into the friction materials. Because Lipe ceased doing any active business prior to the merger in which Dana acquired Echlin, Inc., Dana has limited knowledge about the history of Lipe and its products containing asbestos.

Since entry of the October 20, 2003 Order, Dana has reviewed limited information which was maintained by Echlin, Inc. relative to Lipe Corporation. Dana's responses are principally based upon information within Echlin, Inc.'s possession, custody and control.