

REQUEST NO. 23:

Any and all writings or documents of any nature whatsoever referred to, or identified in any answer to the Plaintiffs' interrogatories directed to this Defendant. Please be advised that the Plaintiff will not accept as an answer to any interrogatory question or in response to any request for production a statement that documents are in the possession of the Defendant or any other entity and will be made available for inspection and copying upon request. Please be advised that such a statement is not deemed responsive to an interrogatory question or a request for production under the Illinois Supreme Court Rules. Please produce copies of any and all documents or writings responsive to any request for production or referred to or identified in any answer to any interrogatory.

RESPONSE:

See Answers to Interrogatory Nos. 16, 43, 93, 95 and 120 in Dana Corporation's Supplemental Answers and Objections to Plaintiffs' Interrogatories Regarding Warner Electric Brake & Clutch Company Pursuant to Order Dated October 20, 2003. Defendant's investigation and review of documents is ongoing and Defendant reserves the right to supplement or amend this response. Documents responsive to this request are labeled Warner SBC-04-000009-000020; 08-000045-000076; 08-000163-000166; 24-000011; 24-000018-000046; 08-000051-000064; 08-000074-000078; 25-000001-001167; 09-001131-001183; 21-000001-000232.

REQUEST NO. 24: