

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Further objecting, the interrogatory is overly broad given the parameters and subject matter of this case. Further objecting, the information sought is neither relevant to the subject matter of the pending action nor reasonably calculated to lead to the discovery of admissible evidence as it relates to Dana. Subject to and without waiving objections, Dana does not know whether Smith & Kanzler Company's board of directors had any meetings at which (a) asbestos-containing products; (b) asbestosis; (c) other asbestos-related diseases, including but not limited to lung cancer, mesothelioma, pleural plaques; or (d) dust studies that measure asbestos dust and fibers were discussed.

INTERROGATORY NO. 3:

For the time period during which asbestos-containing products were manufactured, assembled, sold or distributed by Defendant, and for the year preceding such activity, identify by date any safety meetings, or meetings concerning safety issues, at any plant or other facility of Defendant where the following topics were discussed:

- (a) Asbestos-containing products;
- (b) Asbestosis;
- (c) other asbestos-related diseases, including but not limited to lung cancer, mesothelioma, pleural plaques; and
- (d) dust studies that measure asbestos dust and fibers.

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