

- (b) The name of the employee or official of the company receiving such advice;
- (c) How Defendant received notice of such limits or concentrations.

**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. Further objecting, the terms "threshold limit values" and "maximum allowable concentrations" are undefined, ambiguous, vague and argumentative. Subject to and without waiving objections, Dana states as follows:

- (a) Dana does not know the year, if ever, in which Smith & Kanzler Company or any predecessor(s) or subsidiaries were first advised of such limits or concentrations;
- (b) Dana does not know the name of the employee, or official, of Smith & Kanzler Company, if any, receiving such advice;
- (c) Dana does not know how Smith & Kanzler Company received notice of such limits or concentrations, if notice was given.

**INTERROGATORY NO. 58:**

Were the threshold limit values or maximum allowable concentrations inquired about in Interrogatory No. 63 for total dust, and not asbestos dust alone?

**ANSWER:**

Interrogatory No. 63 does not mention threshold limit values or maximum allowable concentrations.

**INTERROGATORY NO. 59:**

State in detail what tests, if any, Defendant ever made with regard to the quantity, quality, or threshold limit values of asbestos dust or particles to which workers were exposed while using, working with or around, or installing your asbestos-containing products.