

supplement these responses.

In 1966 Dana Corporation acquired 100% of the stock an Illinois corporation known as Victor Manufacturing & Gasket Company, incorporated in Chicago, Illinois. In 1967, Victor Manufacturing & Gasket Company was dissolved pursuant to and in conformity with relevant provisions of the Illinois Business Corporation Act of 1933, contained at Ill. Rev. Stat. Ch. 32 §§ 74-81(1967). The Act was in effect in Illinois at the time of the voluntary dissolution of Victor Manufacturing & Gasket Company. Other provisions of the Act governed merger and consolidation. *See* Ill. Rev. Stat. Ch. 32 § § 61-70 (1967). No attempt was made to merge Victor Manufacturing & Gasket Company with Dana. Dana formed the Victor Division of Dana Corporation in approximately 1967 (now known as the Victor Reinz Division).<sup>1</sup>

Dana rejects any liability for products manufactured by the dissolved company known as Victor Manufacturing & Gasket Company. Moreover, to the extent that these interrogatories and requests for production attempt to impose an obligation upon Dana to provide information and/or documents for that dissolved company, Dana objects to such interrogatories and requests for production. Dana limits these responses to Dana's Victor Products Division that manufactured gaskets beginning in approximately 1967. Dana limits its responses to the time periods requested by plaintiffs but not earlier than 1967.

Dana Corporation ("Dana") manufactures primarily vehicular products. Plaintiffs may allege that certain asbestos-containing building materials caused their claimed injuries. Dana does not now, nor has it ever, manufactured, sold or distributed asbestos-containing building materials.

---

<sup>1</sup> Victor Products Division (now Victor Reinz Division), excluding Reinz Wisconsin Gasket Co. is hereinafter referred to as "Victor Products Division".