

- (e) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form.
- (f) Who is the custodian of such information.
- (g) The date on which you first received knowledge or information that asbestosis was caused by inhalation of asbestos fibers.

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 states as follows:

- (a) Dana does not know when, if ever, Smith & Kanzler Company or its subsidiary or predecessor first learned that asbestosis was caused by inhalation of asbestos fibers by humans.
- (b) Dana does not know how, if ever, Smith & Kanzler Company became aware of the existence of asbestosis.
- (c) Dana does not know who, if anyone, within Smith & Kanzler Company first discovered, recognized or understood the adverse consequences or effects of asbestosis and/or of asbestos exposure.
- (d) Dana does not know what, if any, information was disseminated within Smith & Kanzler Company or its subsidiary or predecessor regarding such adverse consequences or effects.
- (e) Dana does not know whether Smith & Kanzler Company or its subsidiary or predecessor still maintains such information in any written form.
- (f) Dana does not know who, if anyone, is the custodian of such information.
- (g) Dana does not know the date, if ever, on which Smith & Kanzler Company first received knowledge or information that asbestosis was caused by inhalation of asbestos fibers.