

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).¹ Dana rejects any liability for products manufactured by the dissolved company known as Victor Manufacturing & Gasket Company.

These responses are provided with the above qualifications and Dana's answers are expressly limited as noted above. To the extent these interrogatories and requests for production attempt to impose an obligation upon Dana to respond on behalf of or with documents in the possession of persons, businesses or entities that are not parties to this lawsuit, Dana objects to such interrogatories and requests for production.

These responses are based upon a reasonable investigation into the relevant facts and are as accurate as possible understanding that in the intervening years persons who may have had knowledge of the relevant facts may have died, left the employ of the company or simply forgotten events of so long ago. Further, if the plaintiffs provide more specific information, for example, time periods of exposure to particular products, it may be possible that more specific responses can be provided to these interrogatories and requests for production.

Because many of the matters inquired about in these interrogatories and requests for production took place decades ago, information furnished in the responses that follow may be incomplete. As discovery in this action is not complete, Dana cannot exclude the possibility that its continuing investigations of the allegations made in this case may reveal more complete information.

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