

Products Division ever manufactured, sold, designed, supplied, marketed, distributed, relabeled, and/or resold any respiratory protection product.

INTERROGATORY NO. 65:

Identify any studies, reports, communications or knowledge you have concerning the effectiveness of Defendant's respirators marketed as appropriate for usage in the presence of asbestos fiber, including the date, title, entity received from and opinions or conclusions.

ANSWER:

See Answer to Interrogatory No. 64, which is incorporated herein as if fully rewritten.

INTERROGATORY NO. 66:

Identify all health or safety related journals, periodicals, magazines and other publications to which you or your Environmental, Industrial Hygiene, Safety, Research & Development or Medical Departments or equivalents subscribed to or received from 1920 until the present time, listing as to each the respective time periods each such publication was subscribed to or received and whether you maintained a medical and/or scientific library at any time.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Further objecting, Dana cannot properly respond to this interrogatory because Plaintiffs have not specified a product to which Plaintiffs were exposed and for which Dana is responsible. Subject to and without waiving objections, Dana reserves the right to amend or supplement this answer, subject to all objections now raised or that can be raised if Plaintiffs provide product exposure information.