that maintained by defendant in the ordinary course of its business.

7. Defendant objects to each interrogatory or part thereof to the extent that it seeks information concerning or contained in documents which it objects to producing.

8. Defendant objects to each interrogatory and part thereof to the extent that it seeks to impose on defendant a discovery obligation to respond for defendant's businesses and entities not parties to this litigation. Defendant responds to these interrogatories on behalf of itself with information known to it about Victor products. Dana was incorporated under the name Spicer Manufacturing Corporation. The corporation changed its name in 1946 to Dana Corporation. There is no "predecessor" entity to Dana. Further, because Dana is a company employing thousands of people, it would be practically impossible to inquire of all Dana's officers, directors, employees, or partners about their individual knowledge and Dana objects to doing so.

9. Defendant objects to each interrogatory or part thereof, and instructions thereto, as unreasonable, unduly burdensome or expensive, given the needs and parameters of these cases.

10. Defendant objects to each interrogatory or part thereof that seeks to determine the knowledge, familiarity, or awareness of Dana. It is not possible to state precisely if or when a corporation can be said to have such knowledge; that is a mixed question of fact and law. Defendant objects to imputing knowledge, familiarity or awareness to defendant based upon the knowledge,