

admissible evidence as it relates to Dana. Subject to and without waiving objections, Dana answers as follows:

(a)-(c) See response to Interrogatory No. 4, which is incorporated herein as if fully rewritten.

(d) Dana believes that Smith & Kanzler Company manufactured its product beginning in 1964 when the company was formed.

(e) Further objecting, the chemical ingredients, including the percentage of asbestos, are proprietary information and cannot be disclosed without written authorization from Smith & Kanzler Company's authorized officer. Celotex Corporation admits that it is the successor-in-interest to Smith & Kanzler Company, and, therefore, it is that company's officer that should authorize release of any formula information. To the extent that Dana's knowledge about the formula is knowledge obtained in litigation through counsel, work-product privilege is claimed. To the extent formula information has been disclosed by Celotex and obtained by Dana, the communication indicates that the information should be limited to the purposes of that specific litigation only. Subject to and without waiving objections, Dana has little knowledge about the composition of Smith & Kanzler Company's products. Dana believes that a product called "SprayCraft" was composed of a combination of asbestos fibers and inorganic binders. The percentages are unknown to Dana. Dana believes that SprayCraft was sold in bags and then mixed with other materials and applied at the application site.

(f) Dana does not know when, if ever, SprayCraft was removed from the market nor the reasons, if any, therefor.

(g) Dana does not know the date, if ever, that asbestos was removed from SprayCraft nor the reasons, if any, therefor.

(h) See answer to (e) above, which is incorporated herein as if fully rewritten.

(i) Dana believes that SprayCraft was a sprayed-on fireproofing/acoustical/thermal insulating product.

(j) Dana sold the stock of Smith & Kanzler Company in February, 1969, and does not know the last year that Smith & Kanzler Company sold its asbestos-containing product.

INTERROGATORY NO. 7:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the