

L. Dana Corporation will provide the information requested if the specific Victor product is identified. See also responses to Interrogatories 9 and 14(E), supra.

M. See Preliminary Statement and General Objections.

Further objecting, this interrogatory is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving objections, Dana will provide the information requested if the specific Victor product is identified.

N. See Preliminary Statement and General Objections.

Subject to and without waiving objections, Victor has had produced a Master Gasket Catalogue which is maintained at the Victor facilities and is also available at other locations.

O. See response to 14(N) above.

P. See response to 14(N) above and 14(K) above.

Q. Victor has been in business since 1909 and there are over 60,000 different types of gaskets manufactured by Victor.

Further objecting, this interrogatory is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving objections, Dana will provide the information requested if the specific Victor product is identified.

R. Dana objects to this interrogatory as overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Victor has been in business since 1909 and there are over 60,000 different types of gaskets manufactured by Victor.

Subject to and without waiving objections, see response to Interrogatory 14(B) above.

S. See Preliminary Statement and General Objections. Subject to and without waiving objections, Dana does not know yet which of its thousands of gaskets are involved in these cases. Some products have patents.

T. See Preliminary Statement and General Objections.

Further objecting, this interrogatory is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.