

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, this defendant has not identified exhibits it intends to use at the trial of this case. Dana reserves the right to rely on the exhibits of other defendants in this case.

INTERROGATORY NO. 63:

Please state when you first received a copy of the Fleischer/Drinker Report published in 1945/1946.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, Dana does not know when, if ever, Victor Products Division first received a copy of the article entitled "A Health Survey of Pipe Covering Operations in Constructing Naval Vessels", published in January, 1946 in the Journal of Industrial Hygiene & Toxicology, and authored by W. Fleischer and P. Drinker, et al ("the Fleischer-Drinker Report").

INTERROGATORY NO. 64:

With regard to your Respirators, identify each and every claim, advertisement, or announcement you made in writing concerning the ability to the respirator to protect against inhalation of dust/fibers or disease, including, date of claim, wording of claim, individual making making claim, form of claim and publication of claim.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, Dana does not presently believe that Victor