

RESPONSE:

See Response to Request for Production No. 9, which is incorporated herein as if fully rewritten. Documents responsive to this request have been produced for Request No. 9 and potentially for one or more other Requests.

REQUEST NO. 20:

Any and all writings or documents of any nature whatsoever referring, reflecting, concerning, or relating to in any way the subject of worker's safety including but not limited to, any safety manuals, employee handbooks, safety rules and instructions, or any writings or documents of a similar nature in the possession of this Defendant, any predecessor or related companies from 1930 to date.

RESPONSE:

See Answer to Interrogatory No. 84 in Dana Corporation's Supplemental Answers and Objections to Plaintiffs' Interrogatories Regarding Warner Electric Brake & Clutch Company Pursuant to Order Dated October 20, 2003. Documents responsive to this Request have been produced in response to Request for Production No. 5 and potentially for one or more other Requests.