

in-interest to Smith & Kanzler Company) and obtained by Dana, the communication indicates that the information should be limited to the purposes of that specific litigation only.

- d. In those gaskets that contained asbestos, the percentage by weight of asbestos varied widely, depending on the specifications of the gasket. Without the identification of a specific gasket product, Defendant is not able to reasonably respond to the entirety of this interrogatory. If plaintiffs identify an asbestos-containing product to which they claim exposure, Defendant will provide available information requested about the product. Victor Products Division has manufactured gaskets without asbestos since its inception in 1967. See (c) above with respect to Smith & Kanzler Company's product SprayCraft.
- e. If plaintiffs identify an asbestos-containing Victor gasket to which they claim exposure, Defendant will provide available information requested about the product.
- f. Gaskets are intended to be used in vehicular applications. Smith & Kanzler's SprayCraft product was intended to be used as a building insulation.
- g. Victor Products Division purchased raw asbestos fiber for the manufacture of gaskets from a number of suppliers, among them: Johns-Manville, Canadian Johns-Manville Asbestos, Ltd., and Lake Asbestos of Quebec. Dana does not know the names and addresses of Smith & Kanzler Company's suppliers.

INTERROGATORY NO. 10:

If you manufactured or distributed any product containing any amount of asbestos, please identify, by location and product produced, each plant in which such product was manufactured and/or assembled, the dates of operation for each such plant, and any employee of any such plant who has filed a claim under any occupational disease or worker's compensation statute for any asbestos-related disease, including, but not limited to, mesothelioma, asbestosis, and lung cancer. For each individual identified:

- a. State the date the claim was filed;
- b. Identify the governmental agency and location where the claim was filed;
- c. Identify where the records of the claim may be located, examined and copied;
- d. Identify the employee's occupation; and
- e. Identify the disease alleged by the claimant.