

32 §§61-70 (1967). No attempt was made to merge Victor Manufacturing & Gasket Company with Dana.

To the extent Dana can determine from the complaint and deposition testimony, it is apparently contended that plaintiff Allen Fuller was exposed to asbestos-containing gaskets allegedly manufactured, *inter alia*, by Victor Manufacturing & Gasket Company. To the extent these interrogatories attempt to impose an obligation upon Dana to provide information and/or documents for any time period prior to Victor Manufacturing & Gasket Company's dissolution, Dana objects to such interrogatories. Dana strictly limits these answers to Dana's Victor Products Division ("Victor") that manufactured gaskets beginning in the late 1960's. Dana limits its responses to the time periods requested by plaintiffs but not earlier than 1968.

These responses are provided with the above qualifications and Dana's answers are expressly limited as noted above. To the extent these interrogatories attempt to impose an obligation upon Dana to respond on behalf of or with documents in the possession of persons, businesses or entities that are not parties to this lawsuit, Dana objects to such interrogatories.

Further, these interrogatories seek information about events occurring many years ago. These answers are based upon a reasonable investigation into the relevant facts and are as accurate as possible understanding that in the intervening years persons who may have had knowledge of the relevant facts may have died, left the employ of the company or simply forgotten events of so long ago. Further, if the plaintiffs provide more specific information, for example, time periods of exposure to particular products, it may be possible that more specific responses can be provided to these interrogatories.

Many of the matters inquired about in these interrogatories took place decades ago, and thus information furnished in the answers that follow may be incomplete. As discovery in this action is not complete, Dana cannot exclude the possibility that its continuing investigations of the allegations made in this case may reveal more complete information. Dana specifically reserves the right to amend, supplement, modify or otherwise change these responses in the event that it acquires additional information responsive to these interrogatories, or if it appears omissions or errors have been made.

GENERAL OBJECTIONS

1. Defendant objects to each interrogatory and part thereof to the extent that plaintiffs may assert that plaintiffs' definition for words is binding on defendant or purports to impose upon defendant obligations beyond those imposed by the Rules of Civil Procedure.
2. Defendant objects to each interrogatory and part thereof to the extent it calls for information protected by (a) the attorney-client privilege, (b) attorney-work-product doctrine, (c) any applicable privilege relating to communications between counsel for Dana and counsel for other defendants regarding this or similar litigation, (d) any applicable privilege relating to