

RESPONSE TO MASTER INTERROGATORY 41:

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 states that during its early history Victor belonged to the Society of Automotive Engineers, the American Society for Testing and Materials and the American Chemical Society. In 1985, Victor became an associate member of the Asbestos Information Association. Recently, Victor joined the Gasket Fabricators Association and the Asbestos Free Gasket Group. Generally, the written materials the company received would have been in the form of newsletters. To the extent that documents are maintained from these organizations, they would be maintained at Victor's facilities in Illinois.