

INTERROGATORY NO. 4:

Identify any asbestos-containing products manufactured by other companies that were sold and/or distributed by Defendant, its predecessors and/or subsidiaries. State the time periods during which any such products were sold and/or distributed.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Further objecting, the interrogatory is overly broad given the parameters and subject matter of this case. Further objecting, the information sought is neither relevant to the subject matter of the pending action nor reasonably calculated to lead to the discovery of admissible evidence as it relates to Dana. Subject to and without waiving objections, Dana does not know whether Smith & Kanzler Company, its predecessors and/or subsidiaries, sold or distributed any asbestos-containing products manufactured by other companies.

INTERROGATORY NO. 5:

Identify by name and location each plant ever owned, operated, or at any time bought by or under the control of Defendant in which asbestos-containing products were manufactured, assembled, or prepared for sale or marketing, and state the time periods during which that activity took place.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Further objecting, the interrogatory is overly broad given the parameters and subject matter of this case. Further objecting, the information sought is neither relevant to the subject matter of the pending action nor reasonably calculated to lead to the discovery of admissible evidence as it relates to Dana. Subject to and without waiving objections, from September 1967 until February 1969 Smith & Kanzler Company owned and operated a plant in Linden, New Jersey in which asbestos-containing products were manufactured, assembled, or prepared for sale or marketing.

INTERROGATORY NO. 6:

For each plant identified in Interrogatory No. 5, and for the time periods identified therein, list the dates, if any, on which ventilation systems were installed, or modifications to improve ventilation were made to existing systems. Provide a brief description of the changes made.