

- (2) Its date(s) of incorporation, if a corporation;
- (3) Its state(s) of incorporation;
- (4) Its corporate purposes;
- (5) Whether the subsidiary or predecessor was involved in any manner in the sale, manufacture, and/or distribution of asbestos-containing products.
 - (a) The years that the subsidiary or predecessor was involved in the sale, manufacture, and/or distribution of asbestos-containing products.
 - (b) A description of the nature or type of asbestos that the subsidiary or predecessor sold, manufactured, or distributed.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein by reference. Further objecting, the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence as it relates to Dana.

Subject to and without waiving objections, Dana Corporation was incorporated in Virginia in 1916 under the name Spicer Manufacturing Corporation. In 1946, the corporation changed its name to Dana Corporation, by which name it has been known ever since. In 1966, Dana acquired 100% of the stock of an Illinois corporation known as Victor Manufacturing & Gasket Company ("Victor"), headquartered in Chicago, Illinois. The Victor Manufacturing & Gasket Company was incorporated in 1909. In about 1967, the Victor Manufacturing & Gasket Company was dissolved. The Victor Products Division of Dana began at about the same time. The Victor Products Division of Dana manufactures primarily vehicular gaskets.

Subject to and without waiving objections, Dana states that certain Victor gaskets were composed of a combination of asbestos fibers (primarily chrysolite), steel, rubber and binding agents. Some Victor gaskets contained no asbestos. Certain gaskets contained asbestos from the inception of the Victor Products Division until 1988 when asbestos was eliminated as a component.

4. ASBESTOS/MANUFACTURE

Has Defendant at any time, engaged in the manufacture of any asbestos containing product?
If so, please state:

- A. The years during which such activity took place;
- B. If such activity was terminated, the reason why;