

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, in February, 1969, less than eighteen months after acquiring the stock of Smith & Kanzler Company, Dana sold the stock of Smith & Kanzler Company to Philip Carey Corporation (Ohio) ("Carey (Ohio)"). At that time Smith & Kanzler Company's business records either remained with Smith & Kanzler Company or were passed to Carey (Ohio). Because Dana merely owned the stock of Smith & Kanzler Company for less than eighteen months and because Dana does not have possession of Smith & Kanzler Company's records, Dana does not have custody and control of documents, if any, sought by this interrogatory that were generated during or relate to the relevant time period described above. Dana does not know whether Smith & Kanzler Company has in its possession any books, pamphlets, memoranda, or written materials of any kind or character that would indicate that asbestos fibers, when inhaled, can be hazardous to the health of human beings.

INTERROGATORY NO. 20:

Has Defendant or any of its subsidiary or predecessor companies at any time been a member of any trade organization or association that published or disseminated any documents or information relating to the hazards of asbestos comprised of other manufacturers, miners, marketers, and/or sellers of asbestos products? If so, state:

- (a) The name and address of each such association or organization.
- (b) The dates during which Defendant or any of its subsidiaries or predecessors were members.
- (c) The names and dates of any publications, minutes, or reports published, written, or disseminated by any of the named associations or organizations.
- (d) Whether any of those publications are still in your possession, and if so:
 - (i) A description of the publications, including the date.
 - (ii) The current location of such publications.
 - (iii) The custodian of such publications.