Smith & Kanzler Company or Smith and Kanzler Corporation).

Moreover, Dana merely owned Smith & Kanzler Company's stock for less than 18 months and Dana never had possession of Smith & Kanzler Company's books and records. Dana sold the stock of Smith & Kanzler Company to Philip Carey Corporation (Ohio) on February 18, 1969. Smith & Kanzler Company's records either remained with it or passed to Philip Carey Corporation (Ohio).

These responses are provided with the above qualifications and Dana's answers are expressly limited as noted above. To the extent these interrogatories and requests for production 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 and requests for production.

These responses 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 and requests for production.

Because many of the matters inquired about in these interrogatories and requests for production took place three decades ago, information furnished in the responses 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.