

To date, has Defendant ever attempted to recall its asbestos-containing products?

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 ever attempted to recall its asbestos containing products.

INTERROGATORY NO. 27:

Describe in detail:

- (a) How your documents relating to asbestos, asbestos diseases, and asbestos-containing products are maintained;
- (b) How your documents relating to asbestos, asbestos diseases and asbestos-containing products are organized; and
- (c) Where these documents are kept.

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 where or how Smith & Kanzler Company maintained and organized its documents relating to asbestos, asbestos diseases, and asbestos-containing products.