

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.

Subject to and without waiving objections, defendant limits its response to Dana tests regarding possible health effects of exposure to vehicular gaskets and excludes tests conducted as attorney work product and/or subject to attorney-client privilege, tests regarding the quality or performance of the gaskets, and tests to assure compliance with applicable governmental regulations regarding the amount of asbestos dust at manufacturing facilities. With these limitations, such test defendant is aware of was conducted in May of 1988 and consisted of opening packages of engine gasket rebuilding kits and measuring the air level of dust. Documents demonstrating the results of the tests were maintained at a Victor facility in Illinois. Dana will attempt to locate the information known to it if the specific Victor product plaintiff Allen Fuller was exposed to is identified by plaintiffs and if the test relates to that product.

10. ASBESTOS FREE PRODUCTS

For each asbestos containing product identified in Interrogatory Answer No. 7 and 8, state:

- A. Was the product, or a substitute for that product, ever manufactured and/or sold by you without asbestos; if so, when did the manufacture and/or sale of the product commence;
- B. The brand name of the asbestos free product;
- C. The reason product was manufactured without asbestos;
- D. Was the asbestos-containing counterpart of the product manufactured and/or sold while the asbestos-free counterpart was being manufactured and/or sold, and, if so, provide the time periods.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein by reference. Subject to and without waiving objections, see answers to Interrogatory Nos. 3, 7, and 8. The primary substitute material is known as an aramid fiber, which is in the plastics family. The brand name used is known as Kevlar. The substitute for asbestos was used because the Victor Products Division discontinued use of asbestos in its gaskets.