

INTERROGATORY NO. 14:

State the time periods, if any, during which Defendant was a member of each of the following organizations:

- (a) Asbestos Textile Institute (ATI);
- (b) Quebec Asbestos Mining Association (QAMA);
- (c) National Insulation Manufacturers Association (NIMA);
- (d) Industrial Hygiene Foundation (IHF);
- (e) Air Hygiene Foundation (AHF);
- (f) Asbestos Information Association (AIA); and
- (g) American Conference of Governmental Industrial Hygienists (ACGIH).

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 was ever a member of the organizations listed in Interrogatory No. 14.

INTERROGATORY NO. 15:

State the dates and amounts of any financial contributions that were made by this Defendant to each of the following organizations:

- (a) Asbestos Textile Institute (ATI);
- (b) Quebec Asbestos Mining Association (QAMA);
- (c) National Insulation Manufacturers Association (NIMA);
- (d) Industrial Hygiene Foundation (IHF);
- (e) Air Hygiene Foundation (AHF);
- (f) Asbestos Information Association (AIA); and
- (g) American Conference of Governmental Industrial Hygienists (ACGIH).

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 what amounts of financial contributions, if any, that Smith & Kanzler Company made to the organizations listed in Interrogatory No. 15.