

8.26.04

IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

IN RE: ALL ASBESTOS LITIGATION)
FILED BY THE SIMMONS FIRM, LLC,)

Plaintiffs,)

vs.)

A.W. CHESTERTON INC., *et al.*,)

Defendants.)

**DANA CORPORATION'S ANSWERS
AND OBJECTIONS TO PLAINTIFFS'
INTERROGATORIES REGARDING
LIPE CORPORATION, PURSUANT TO
ORDER DATED OCTOBER 20, 2003**

PRELIMINARY STATEMENT

Pursuant to Consent Order dated October 20, 2003, Dana Corporation ("Dana") provides answers to Master Interrogatories about Lipe Corporation, "Lipe". This preliminary statement applies to and is incorporated into each Answer.

Dana answers these interrogatories after reasonable investigation with the best available information presently known about Lipe Corporation and its historical product lines. To the extent Dana manufactured products that were not Lipe Corporation's historical product lines, those products will be reported separately as otherwise required by the October 20, 2003 Order.

Lipe Corporation was originally incorporated in Delaware on April 8, 1985, as a wholly owned subsidiary of Echlin, Inc. On April 9, 1985, Echlin acquired the assets of Lipe-Rollway Corporation's Lipe clutch division, which manufactured and remanufactured clutches for heavy duty trucks. Immediately thereafter, Echlin transferred these assets in capitalization of Lipe Corporation. As of February 1998, Lipe became an inactive corporation and was no longer engaged in the manufacture, remanufacture or sale of clutches. During the period of time in which Lipe manufactured or remanufactured clutches, some clutches were asbestos-containing