

13. Defendant answers these requests for production on behalf of itself with information developed after a reasonable investigation into the relevant facts. The objections stated above are incorporated by reference in each response herein as if fully set forth below. No such objection is waived by answering a request for production in whole or in part. Any response provided herein is subject to and limited by all objections raised and all objections as to admissibility and all such objections are hereby expressly reserved and may be interposed at any time.

14. Defendant objects to each interrogatory and part thereof to the extent that plaintiffs may assert that plaintiffs' definitions for words are binding on defendant or purport to impose upon defendant obligations beyond those imposed by the Rules of Civil Procedure.

15. Defendant objects to each interrogatory and part thereof to the extent it calls for answers disclosing information protected by (a) the attorney-client privilege, (b) the attorney-work product doctrine, (c) any applicable privilege relating to communications between counsel for defendant and counsel for other defendants in this or other cases regarding defense of the case, (d) any applicable privilege relating to communications between defendant's employees or counsel and defendant's insurers regarding the defense of this claim or claims of this type, (e) any privilege relating to confidential trade secrets, proprietary information or confidential communications with any government agency, (f) the right of privacy or (g) any other privilege.

16. Defendant objects to each interrogatory and part thereof to the extent that 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.

17. Defendant objects to each interrogatory and part thereof to the extent that it seeks information not within the custody and control of Dana.

18. Defendant objects to each interrogatory and part thereof to the extent that it seeks to require answers or information, or require identification of documents, or impose obligations, beyond those permitted by the applicable rules of Civil Procedure and local rules of court.

19. Defendant objects to each interrogatory and part thereof to the extent that it seeks information in a form different from that maintained by Dana in the ordinary course of its business.

20. Defendant objects to each interrogatory and part thereof to the extent that it seeks information concerning or contained in documents which it objects to providing.

21. Defendant objects to each interrogatory and part thereof to the extent that it seeks to impose on defendant a discovery obligation to respond for defendant's businesses and entities not parties to this litigation. Defendant responds to these interrogatories on behalf of itself with information known to it about Smith & Kanzler Company and that company's product known