INTERROGATORY NO. 4:

Has Defendant been sued under its correct legal name? If not, state the correct legal name of Defendant and provide the information requested in No. 3 above concerning the defendant as correctly named.

ANSWER:

Defendant reserves the right to respond to this question as it pertains to whether Dana Corporation has been properly named in individual cases. Some plaintiffs previously sued Warner Electric, Inc. This company is not owned by or related to Dana Corporation. Warner Electric, Inc. has answered these same interrogatories for itself and in its own name.

INTERROGATORY NO. 5:

Identify any and all persons or entities which [,between 1930 and 1980,] own[ed], or at any time have owned, more than a ten percent (10%) interest in this Defendant, and for each such person or entity identified, state the date(s) during which said person or entity owned more than a ten percent (10%) interest in Defendant and the specific type and amount of interest owned.

ANSWER:

As to Warner Electric Brake & Clutch Company, Defendant believes that the founder, A. P. Warner, the Pierpont and Steve Wood family and William Keefer may have owned more than 10% interest in Warner Electric Brake & Clutch Company at some time prior to Defendant's acquisition of the company in 1985. Regarding holders of 10% or more of Defendants' shares for any year since 1984: FMR Corp. (1996) (11.06%), Alliance Capital Management, L.P. (2001) (13.5%), AXA Financial, Inc. (2002) (12.5%), and AXA Financial (2003) (11.2%). However, Dana currently is not