

provided respirators to any employees using asbestos-containing products.

INTERROGATORY NO. 12:

For each plant identified in Interrogatory No. 9, and for the time periods identified therein, list the dates, if any, on which warnings about the health hazards of asbestos were issued to employees.

ANSWER:

See answer to Interrogatory No. 9, which is incorporated herein as if fully rewritten. Subject to and without waiving objections, Dana does not know whether Smith & Kanzler Company ever issued warnings about the health hazards of asbestos to its employees.

INTERROGATORY NO. 13:

Prior to 1990, did any person file a claim against a Workers' Compensation carrier covering Defendant, its predecessors, and/or its subsidiaries, alleging that he/she contracted a disease from inhaling asbestos fibers while employed by Defendant, its predecessors, and/or its subsidiaries? If so, provide:

- (a) a list of the claims, including each claimant's name, address and the date each claim was filed, and including the caption and jurisdiction of the claim;
- (b) the disease alleged in each such claim;
- (c) a brief summary of the disposition of each such claim; and
- (d) the name, address and title of the person having custody of the records pertaining to each such claim.

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 prior to 1990, any person filed a claim against a Workers' Compensation carrier covering Smith & Kanzler Company, its predecessors, and/or its subsidiaries, alleging that he/she contracted a disease from inhaling asbestos fibers while employed by Smith & Kanzler Company, its predecessors, and/or its subsidiaries.