

"predecessor" entity to Dana. Further, because Dana is a company employing thousands of people, it would be practically impossible to inquire of all Dana's officers, directors, employees, or partners about their individual knowledge and Dana objects to doing so.

9. Dana objects to each interrogatory or part thereof as unreasonable, unduly burdensome or expensive, given the needs and parameters of this case, to the extent that the interrogatories relate or may relate to defendant's vehicular products.

10. Defendant objects to each interrogatory and part thereof to the extent that the interrogatory seeks information about events that occurred, or may have occurred, prior to the incorporation of Smith & Kanzler Company in 1964 or after Dana's sale of Smith & Kanzler Company stock in 1969.

11. Defendant objects to each interrogatory or part thereof that seeks to determine the knowledge, familiarity, or awareness of Dana. It is not possible to state precisely if or when a corporation can be said to have such knowledge; that is a mixed question of fact and law. Defendant objects to imputing knowledge, familiarity or awareness of an employee or employees or agent or agents of Dana.

12. Dana objects to each interrogatory and part thereof calling for opinions rather than facts.

13. Dana objects to each interrogatory unless plaintiff's identify a product injuring them for which Dana is responsible.

The objections stated above are incorporated by reference in each response herein, as if fully set forth below. No such