

11/21/03

**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'**
) **REQUEST FOR PRODUCTION OF**
) **DOCUMENTS REGARDING WARNER**
) **ELECTRIC PURSUANT TO ORDER**
) **DATED OCTOBER 20, 2003**
)

PRELIMINARY STATEMENT

Pursuant to the consent order dated October 20, 2003, Defendant Dana Corporation provides responses and objections to Master Requests for Production about "Warner Electric." This Preliminary Statement applies to and is incorporated into each response.

Dana answers the Request for Production of Documents after reasonable investigation with the best available information presently known about Warner Electric Brake & Clutch Company and its historical product lines. To the extent Dana manufactured products that were not Warner Electric Brake & Clutch Company's historical product lines, documents relating to those products will be reported separately as otherwise required by the October 20, 2003 order.

Warner Electric Brake & Clutch Company, f/k/a Warner Electric Brake Company, was founded by A. P. Warner before 1930. Warner Electric Brake & Clutch Company was incorporated on December 13, 1962 in the state of Delaware.