

- A. When was it first placed in containers and for what years thereafter;
- B. What products had the insert or brochure/included;
- C. Provide a verbatim statement of the insert.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein by reference. Further objecting, the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence as it relates to this defendant. Subject to and without waiving objections, *see also* answers to Interrogatories 7 and 8. Further, in approximately February of 1985, Victor began inserting a caution label on the finished gaskets. That label read substantially as follows: "This material contains asbestos. Avoid creating dust. Follow OSHA work practices, including use of appropriate dust containment equipment. Inhalation may cause asbestosis or other serious bodily harm. Smoking greatly increases the risk of bodily harm." This cautionary label remained essentially unchanged and was discontinued in 1988.

13. WARNING/MASK

Has Defendant ever placed any form of disposable face mask or respirator in a container of an asbestos-containing product? If so, please state:

- A. The products covered by the practice;
- B. The year this practice begin and the years it was implemented;
- C. Describe the type of face mask or respirator included in the container.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein by reference. Subject to and without waiving objections, not to Dana's knowledge.

14. TRADE ASSOCIATION

- A. State the names and addresses of all professional, industrial, health and safety organizations to which you have belonged which have anything to do with the health effects of asbestos, the proper methods of working with asbestos, methods of controlling asbestos dust, setting of standards or regulations, information, lobbying, research, engineering, or use of asbestos products, materials, or fibers.
- B. As to each trade association state the date of membership.