

RESPONSE TO MASTER INTERROGATORY 23:

See Preliminary Statement and General Objections.

Further objecting, this interrogatory is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to, and without waiving objections, Dana has had an interest in Victor only since 1966 and Victor did not become a division of Dana until after that time. Dana does not know the names, if any, of persons employed by Victor Manufacturing & Gasket Company whose primary duties were to evaluate potential occupational health hazards and suggest methods dealing with same. Since Victor has become a division of Dana, investigation of health hazards if any, would relate primarily to workplace issues for Dana employees. In that regard, Victor has attempted to comply with (and believes it has complied with) all applicable governmental regulations regarding the use and handling of asbestos materials.

Dana objects to this interrogatory to the extent that it seeks information about Victor employee exposure to asbestos. See General Objections.