reflecting, concerning or relating to in any way whatsoever to asbestos, asbestos-containing products, the health effects of the absorption or inhalation of asbestos by humans or animals and/or the application, removal, installation and disposal of asbestos and/or asbestos-containing products.

RESPONSE:

See Answers to Interrogatory Nos. 50, 51, 52, and 53 in Dana Corporation's Supplemental Answers and Objections to Plaintiffs' Interrogatories Regarding Warner Electric Brake & Clutch Company Pursuant to Order Dated October 20, 2003. Defendant has not identified any Warner Electric Brake & Clutch Company documents responsive to this request.

REQUEST NO. 16:

Any and all writings or documents of any nature whatsoever referring, reflecting, concerning or relating to in any way whatsoever to any instructions, advice, suggestions, warnings, guidance, notification, training or education on any health effects on humans or animals of the absorption or inhalation of asbestos fibers, or other dusts in the possession of the Defendant, regardless of whether the writings or documents were authored by employees and/or consultants of the Defendant, provided to it by any of the companies from which it purchased or obtained asbestos or asbestos-containing products, or from any or other source whatsoever including but not limited to trade associations, manufacturing associations, or other professional entities or organizations.