

INTERROGATORIES

INTERROGATORY NO. 1:

Identify the individual verifying these answers on your behalf, including his or her name, present business address, job title, the date he or she first employed by you and the dates and titles of each job position he or she has held while they were employed by you.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, much of the information sought by these interrogatories has been accumulated over time but not necessarily for purposes of responding to these interrogatories. It is not possible to now identify each person who, at some time, may have provided information that is now being used to answer these interrogatories. No single employee, officer or agent of the company has direct knowledge of the documents and information necessary to supply each and every response. Gary Austin, Plant Manager, Victor Reinz, verified the responses to these interrogatories and requests for production.

INTERROGATORY NO. 2:

Describe in detail your corporate history including, but not limited to, date and place of incorporation, corporate purpose, principal place of business, and location of sales offices. Your answer should include any mergers, consolidations, asset purchases, acquisitions, or spin-offs that concern or affect the manufacture, sale, or distribution of any product containing or incorporating any amount of asbestos fiber. Your answer should also specifically identify the name of any such subsidiary or predecessor corporation, its date of incorporation, and its corporate purposes, whether it is still an active corporation, and the identity and custodian of each document related to the history or transaction(s) set forth above.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, Dana Corporation was incorporated in the State of Virginia in 1916 under the name Spicer Manufacturing Corporation. In 1946, the corporation changed its name to Dana Corporation. Its principal place of business is in Toledo, Ohio.

In 1966 Dana Corporation acquired 100% of the stock an Illinois corporation known as Victor Manufacturing & Gasket Company, incorporated in Chicago, Illinois. In 1967, Victor Manufacturing & Gasket Company was dissolved pursuant to and in conformity with relevant provisions of the Illinois Business Corporation Act of 1933, contained at Ill. Rev. Stat. Ch. 32 §§ 74-81(1967). The Act was in effect in Illinois at the time of the voluntary dissolution of Victor