

of removing asbestos from the gaskets that did contain asbestos no later than the early 1980s. Raw asbestos was no longer used as an added component in the manufacture of gaskets after June 1988.

INTERROGATORY NO. 53:

Did your company or its predecessor(s) or subsidiaries ever recall any products containing asbestos from the market or stream of commerce? If so, state:

- (a) All details of such recall;
- (b) The name of the product recalled, including the reason for the recall and the names and current addresses of those individuals who determined that it should take place;
- (c) The dates of recall;
- (d) The purpose for the recall.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, Dana does not presently know whether Victor Products Division ever recalled any products containing asbestos from the market or stream of commerce.

INTERROGATORY NO. 54:

Before 1970, did you ever manufacture or sell products which did not contain asbestos and which could be substituted for your asbestos-containing products? If so, state the date such asbestos-free products were first placed on the market.

ANSWER:

See Answer to Interrogatory No. 52, which is incorporated herein as if fully rewritten.