

removing, and/or contracting to apply or install asbestos, vermiculite, asbestos-containing products and/or vermiculite-containing products at any site as described in Interrogatory number 108 in any location in the State of Illinois, and in any location within a 200 mile radius of Madison County, Illinois.

RESPONSE:

See Answers to Interrogatory No. 22, 41, 108, and 109 in Dana Corporation's Supplemental Answers and Objections to Plaintiffs' Interrogatories Regarding Warner Electric Brake & Clutch Company Pursuant to Order Dated October 20, 2003. Warner Electric Brake and Clutch Company was a manufacturer, not an installer. This request is not applicable except perhaps in cases where a customer service representative may have assisted a customer. Documents responsive to this request are labeled Warner SBC-20-000001-002370; 19-000001-002493; 19-002494-003393; 07-000001-002870; 13-000001-002567; 22-000001-002732; 16-000001-002796; 03-000001-002302; 06-000001-2503; 06-002504-3402; 23-000001-002927; 04-000001-000079; 01-000001-000622; 11-000001-002288.

REQUEST NO. 4:

Any and all documents which reflect the dissemination by this Defendant, any predecessor or related companies, of any and all of the writings or documents referred to in the immediately preceding request, to contractors, subcontractors, unions, employees of the Defendants, or any other persons or entities to whom any such dissemination was made.