4. Asbestos/Mining

Did Defendant, prior to 1980, engage in the mining, milling and/or subsequent sale of asbestos fiber? If so, please state:

A. The date such activity began;

B. The years during which such activity took place;

C. The date when such activity was terminated;

D. If such activity was terminated, the reason why;

E. Within the United States was there any geographic limitation which you claim was applicable to the sales of your asbestos (Yes or No)?

If Yes state the geographical area into which you claim the asbestos was sold; and,

F. Identify the organizational unit of Defendant so engaged.

G. Type of asbestos mined.

H. Managers of each mine and years of service.

I. Identify sales and shipment records from each mine.

RESPONSE TO MASTER INTERROGATORY 4:

See Preliminary Statement and General Objections.

Subject to and without waiving objections, Dana does not now nor has it ever mined, milled or sold asbestos fiber.