

REC'D MAR 04 2003

REC'D AUG 30 2002

CAUSE NO. CV-35116

REC'D JUN 27 2002

CHRISTOPHER STOECKLER and
WENDY STOECKLER,

Plaintiffs

V.

AMERICAN OIL COMPANY, et al.,

Defendants

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IN THE DISTRICT COURT AT

ANGELINA COUNTY, TEXAS

159TH/217TH JUDICIAL DISTRICT

**DANA CORPORATION'S OBJECTIONS AND ANSWERS TO
PLAINTIFFS' FIRST SET OF INTERROGATORIES,
AND REQUEST FOR PRODUCTION TO DEFENDANTS**

PRELIMINARY STATEMENT

These interrogatories seek information about events that occurred many years ago. These responses are based upon a reasonable investigation into the relevant facts and information currently known to Dana.

Because the pending litigation against Defendant appears to involve allegations of exposure to Victor Products Division gaskets, and because of the lack of information regarding allegations of exposure to any other type of asbestos-containing products at issue in these cases, Defendant responds to these interrogatories and requests for production at this time for the Victor Products Division (now the Victor Reinz Division), excluding Reinz Wisconsin Gasket Co., for the period 1967 to date. Investigation into other divisions continues and Dana will supplement as new information is known. If plaintiffs provide information of alleged exposure to specific Dana products not encompassed by these responses, Dana will investigate further and may