

as SprayCraft. Defendant does not respond for other companies that plaintiff may consider to be "subsidiaries" or "affiliates" of defendant but which are not defendant's. Dana was incorporated under the name Spicer Manufacturing Corporation. The corporation changed its name in 1946 to Dana Corporation. There is no "predecessor" entity to Dana. Further, because Dana is a company employing thousands of people, it would be practically impossible to inquire of all Dana's officers, directors, employees, or partners about their individual knowledge and Dana objects to doing so.

22. Dana objects to each interrogatory or part thereof as unreasonable, unduly burdensome or expensive, given the needs and parameters of this case, to the extent that the interrogatories relate or may relate to defendant's vehicular products.

23. Defendant objects to each interrogatory and part thereof to the extent that the interrogatory seeks information about events that occurred, or may have occurred, prior to the incorporation of Smith & Kanzler Company in 1964 or after Dana's sale of Smith & Kanzler Company stock in 1969.

24. Defendant objects to each interrogatory or part thereof that seeks to determine the knowledge, familiarity, or awareness of Dana. It is not possible to state precisely if or when a corporation can be said to have such knowledge; that is a mixed question of fact and law. Defendant objects to imputing knowledge, familiarity or awareness of an employee or employees or agent or agents of Dana.

25. Dana objects to each interrogatory and part thereof calling for opinions rather than facts.

26. Dana objects to each interrogatory unless plaintiffs identify a product injuring them for which Dana is responsible.

27. Dana is a multi-national corporation with thousands of employees at plants and facilities across the nation and around the world. Dana cannot possibly be expected to answer about all of the information in the possession of those thousands of employees past and present. Dana therefore objects to the definition of "Defendant", "you", "your", "your company", "predecessors" and "subsidiaries". Dana answers these interrogatories on behalf of itself with information developed after a reasonable investigation into the relevant facts. The objections stated above are incorporated by reference in each response herein as if fully set forth below. No such objection is waived by answering an interrogatory in whole or in part.

Any response provided herein is subject to and limited by all objections raised and all objections as to admissibility and all such objections are hereby expressly reserved and may be interposed at the time of trial or in response to any motion.