Response:

See Preliminary Statement and General Objections, which are incorporated herein by reference. Subject to and without waiving objections, Dana will produce for inspection and copying the documents requested if the specific Victor product is identified.

8. All asbestos containing gaskets manufactured, distributed, sold, relabelled or installed in engines by Defendant and/or the Victor Division of Dana or the Victor Manufacturing and Gasket Co. which were used between 1971 and 1980 in all vehicles and/or engines.

Response:

See Preliminary Statement and General Objections, which are incorporated herein by reference. Subject to and without waiving objections, Dana will attempt to locate and produce for inspection a gasket if the specific Victor product is identified.

Respectfully submitted,

D. Mark Phillips

Counsel for Defendant
Dana Corporation