ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Dana has not yet determined who it will call as witnesses at the trial this case. A witness list will be provided later as required by rule or order of the court.

INTERROGATORY NO. 40:

Have Defendant or its subsidiaries or predecessors ever acquired through purchase, reorganization, or merger another corporation, company, or business which manufactured, sold, processed, distributed, or contracted or supplied products containing asbestos? If so, for each such entity, state:

(a) Full and correct name;

(b) Principal place of business;

(c) State of incorporation;

(d) Date of acquisition by Defendant;

(e) Whether or not the business entity was ever authorized to transact business in the State of Texas;

ANSWER:

See Preliminary Statement and General Objections, which are incorporated hereinas if fully rewritten. Dana objects to the characterization of any of the businesses described below as predecessors to Dana.

In 1966, Dana Corporation acquired 100% of the stock of an Illinois corporation named Victor Manufacturing & Gasket Company. In 1967, Victor Manufacturing & Gasket Company was dissolved pursuant to and in conformity with relevant provisions of the Illinois Business Corporation Act of 1933, contained at Ill. Rev. Stat. Ch. 32 §§74-81(1967). Victor Manufacturing & Gasket