REQUESTS TO PRODUCE

REQUEST NO. 1:

Any and all writings, or documents of any nature whatsoever, including but not limited to, any purchase orders, invoices, contracts, shipping records, employee files, accounting records, order books, account books, contract books, inventory records, specification standards, engineering standards or sales ledgers of the Defendant, any predecessor or related companies, which refer, reflect, concern or relate to in any way the sale, purchase, receipt, distribution, transfer, shipment, specification, application, installation, removal, storage, or disposal of any asbestos, vermiculite, asbestos-containing products, or vermiculite-containing product to, on, or from, the locations as described in Interrogatory number 108, to, on, or from, any location in the State of Illinois and to, on, or from, any location within a 200 mile radius of Madison County, Illinois.

RESPONSE:

See Answers to Interrogatory Nos. 41, 108, and 109 in Dana Corporation's Supplemental Answers and Objections to Plaintiffs' Interrogatories Regarding Warner Electric Brake & Clutch Company Pursuant to Order Dated October 20, 2003. Documents responsive to this request are labeled Warner SBC-20-000001-002370; 19-000001-002493; 19-002494-003393; 07-000001-002870; 13-000001-002567; 22-000001-002732; 16-000001-002796; 03-000001-002302; 06-000001-2503; 06-002504-3402; 23-000001-002927; 02-000001-000885; 04-000001-000079; 01-000001-000622; 11-000001-002288.