ANSWER:

See Answers to Interrogatory Nos. 43 and 56, which are incorporated herein as if fully rewritten. Dana currently is not aware of any such studies. Dana understands that as early as the 1930's, it was known or knowable that exposures to high doses of asbestos fibers were hazardous to workers' health. The cases reported at that time usually involved persons employed in the manufacture of products where exposures were largely uncontrolled and could have exceeded hundreds of fibers per cc. The disease associated with these intensely high exposures was asbestosis. Dana is not aware that Warner Electric made, manufactured or sold end products that could cause such intensely high exposures nor does Dana believe that such exposures occurred at any manufacturing facilities owned by Warner Electric. Air samples taken confirm this belief.

INTERROGATORY NO. 59:

If your Answer to Interrogatory No. 58 is "yes," with respect to each such study:

(a) Describe the nature of said study, including, but not limited to, the purpose and objectives of the study, the product(s) involved, the date(s) conducted, the methodology employed and the results reached, both raw data and conclusions;

(b) Identify any and all entities and/or persons conducting said study or participating in the conducting of said study;

(c) Identify any and all documents referring to, relating to or reflecting said study, including but not limited to reports (both interim and final), notes, memoranda, work papers, data compilations and surveys;

(d) Identify any and all directors, officers, agents or employees of Defendant who participated in the decision to have the study conducted; and,

(e) Identify any and all entities and/or persons who received a copy of any document referring to, relating to or reflecting the results or conclusions reached.

ANSWER: