Dana specifically reserves the right to amend, supplement, modify or otherwise change these responses in the event that it acquires additional information responsive to these interrogatories and requests for production, or if it appears omissions or errors have been made. Defendant responds to these interrogatories at this time for the Victor Products Division (now the Victor Reinz Division), excluding Reinz Wisconsin Gasket Co., for the period 1967 to date,[2] and with information known about Smith & Kanzler Company and its product SprayCraft.

Dana reserves the right to amend, supplement, modify or otherwise change these responses in the event that it acquires additional information responsive to these interrogatories and requests for production, or if it appears that inadvertent or administrative omissions or errors have been made.

GENERAL OBJECTIONS

1. Defendant objects to each interrogatory and request for production and part thereof to the extent that plaintiff may assert that plaintiff's definition for words is binding on defendant.

2. Defendant objects to each interrogatory and request for production and part thereof to the extent it calls for information protected by (a) the attorney-client privilege, (b) attorney-work-product doctrine, (c) any applicable privilege relating to communications between counsel for Dana and counsel for other defendants regarding this or similar litigation, (d) any applicable privilege relating to communications between defendant's employees or counsel and Dana's insurers regarding the defense of this claim or claims of this type, (e) any privilege relating to confidential trade secrets or confidential communications with any government agency, (f) the

[1] Victor Products Division (now Victor Reinz Division), excluding Reinz Wisconsin Gasket Co. is hereinafter referred to as "Victor Products Division".