

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Without the identification of a specific gasket product, defendant is not able to reasonably respond to the entirety of this interrogatory. If plaintiffs identify an asbestos-containing product to which they claim exposure, defendant will provide available information requested about the product. Subject to and without waiving objections, Dana states as follows:

- (a) Victor Products Division products were manufactured, marketed, distributed, and sold;
- (b) See (a) above;
- (c) See Answer to Interrogatory No. 7, which is incorporated herein as if fully rewritten;
- (d) Victor Products Division has manufactured gaskets with and without asbestos since its inception in 1967;
- (e) Dana used chrysotile asbestos in manufacturing its gaskets. In those gaskets that contained asbestos, the percentage by weight of asbestos varied widely, depending on the specifications of the gasket. Without the identification of a specific gasket product, Defendant is not able to reasonably respond to the entirety of this interrogatory. If plaintiffs identify an asbestos-containing product to which they claim exposure, Defendant will provide available information requested about the product. Victor Products Division has manufactured gaskets without asbestos since its inception in 1967;
- (f) Without the identification of a specific gasket product, Defendant is not able to reasonably respond to the entirety of this interrogatory. If plaintiffs identify an asbestos-containing product to which they claim exposure, Defendant will provide available information requested about the product;
- (g) Victor Products Division started the process of removing asbestos from the gaskets that did contain asbestos no later than the early 1980s. Raw asbestos was no longer used as an added component in the manufacture of gaskets after June 1988;
- (h) Without the identification of a specific gasket product, Defendant is not able to reasonably respond to the entirety of this interrogatory. If plaintiffs identify an asbestos-containing product to which they claim exposure, Defendant will provide available information requested about the product;
- (i) Victor Products Division makes gasket products for passenger cars, trucks, tractors, and industrial engine applications; and
- (j) See section (g) above.