

- e. Asbestos Information Association ("AIA");
- f. Quebec Asbestos Mining Association ("QAMA");
- g. National Safety Council; and/or
- h. any other organizations or associations of manufacturers, miners, distributors, importers, labelers, suppliers, and/or sellers of products containing asbestos fibers.

ANSWER:

See Preliminary Statement and General Objections, which are incorporated herein as if fully rewritten. Subject to and without waiving objections, Victor Products Division became an associate member of the Asbestos Information Association in 1985. In the late 1980's or early 1990's, Victor Products Division joined the Gasket Fabricators Association and the Asbestos Free Group. Dana believes that Smith & Kanzler Company was a member of or affiliated with the Sprayed Mineral Fibre Manufacturer's Association, Inc.

INTERROGATORY NO. 28:

Please state if you or anyone on your behalf ever conducted, sponsored or contributed financially to any studies or research to determine if the inhalation of asbestos fibers may be harmful. If so, please:

- a. identify the individual(s) or organization(s) who conducted the research;
- b. state the dates that each such research project or test was conducted;
- c. describe in detail the specific results of each test or study; and
- d. identify and produce all documents that refer, reflect or relate to the test or study.

ANSWER:

See answer to Interrogatory No. 15, which is incorporated herein as if fully rewritten.

DOCUMENTS TO BE PRODUCED

REQUEST FOR PRODUCTION NO. 1:

Please produce all documents identified or used by you in responding to the Plaintiff's First Set of Interrogatories to Defendants.