

E. Whether or not the business entity was ever authorized to transact business in the State of Texas;

RESPONSE:

GM acquired the assets of the Bondall Company, 500 Bittner Street, St. Louis, Missouri, in 1939. Bondall designed and manufactured brake linings and clutch facings. GM objects to this interrogatory because it is overly broad and unlikely to lead to admissible evidence.

INTERROGATORY NO. 41:

Was each of your asbestos products generally expected to reach, or packaged to reach, the consumer or user, without substantial change in the condition in which it was sold? If not, with respect to any such product, explain in what way the Defendant claims its products were altered or substantially changed after sale or distribution and before reaching the user.

RESPONSE:

Yes.

INTERROGATORY NO. 42:

For each asbestos-containing product identified in response to Interrogatory No. 6, identify all foreseeable users such as insulators, helpers, pipefitters, welders, machinists, plasterers, drywall finishers, carpenters, boilermakers, shipwrights and riggers, etc. of any of Defendant's asbestos-containing products.

RESPONSE:

GM expected mechanics to replace brake linings and clutches from time to time.