

assembled, or prepared for sale or marketing, specifying which plants produced each item, the dates each plant is or was in operation, and the time span during which each named item was produced or manufactured.

ANSWER:

Defendant objects to Interrogatory No. 21 to the extent it is overly broad, general and global and seeks to harass, oppress and impose an undue burden upon Defendant in the form of unnecessary time, expense and manpower. Further, the interrogatory is duplicative of Interrogatory Nos. 3, 5 and 6. Finally, the interrogatory seeks information over a broad span of time and seeks information that is irrelevant and immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, please see Defendant's responses to Interrogatory Nos. 3, 5 and 6, which responses are incorporated herein as if restated verbatim. GM combined asbestos fibers and other ingredients to produce asbestos-containing brake linings at plants operated by Inland Division (later Delco Products and Delco Chassis Divisions) in Dayton, Ohio (1939-1964) and Vandalia, Ohio (1962-present). GM combined asbestos fibers and other ingredients to produce asbestos-containing brake linings (1966-1985) and extruded band linings for automatic transmissions (1965-1979) at plants operated by Delco Moraine Division in Dayton, Ohio.

22. Have printed sales materials been prepared by Defendant or any of its subsidiary or predecessor companies or their agents for purposes of marketing or advertising products containing asbestos? If so, state:
- (a) The name, address, and job title of each person or entity who prepared such materials.
 - (b) The name, address, and job title of each person who currently has possession of such materials and their present location.
 - (c) The date the materials were prepared.
 - (d) The media used to disseminate the sales materials.

ANSWER:

Defendant objects to Interrogatory No. 22 to the extent it is overly broad, general and global and inquires of "predecessor" companies without defining