

5. Please state whether or not Defendant or its predecessor(s) or subsidiaries has ever held a certificate of authority to do business or is otherwise licensed to do business in the commonwealth of Pennsylvania. If the answer is yes, please state the date or dates on which such certificate of authority and/or license was obtained and held and/or the date or dates during which such business was regularly conducted in Pennsylvania.

RESPONSE:

Yes. General Motors Corporation has been authorized to do business in the State of Pennsylvania since December 19, 1941.

6. Describe in detail Defendant's complete corporate or business history, including date of incorporation, any mergers, consolidations, re-incorporations, predecessors, prior names, asset purchases, acquisitions or spin-offs having to do with the manufacture or sale of asbestos-containing products. In addition:
- A. If you have sold any asbestos product line or stock in a company dealing in asbestos-containing products, state the date of the sale, identify the purchaser, and state whether the transaction involved asbestos-containing products; and
 - B. Identify each document related to the history or transaction(s) set forth in answer to this Interrogatory.

RESPONSE:

General Motors Corporation was incorporated in Delaware on October 13, 1916. Its principal place of business is 3044 West Grand Boulevard, Detroit, Michigan 48202. GM has hundreds of facilities located throughout the United States. The immediate predecessor of General Motors Corporation was General Motors Company, incorporated in New Jersey in 1908. GM has numerous subsidiaries.

GM understands that plaintiff's claims involve the allegation that decedent was exposed to asbestos from 1958 to 1961 during brake repair operations. With respect to brake linings, GM acquired the assets of the Bondall Company, 500 Bittner Street, St. Louis, Missouri, in 1939. Bondall designed and manufactured brakelinings and clutch facings. GM also objects to this interrogatory because it is overly broad, burdensome and harassing and it asks for information that is not reasonably calculated to lead to admissible evidence.