B. The years of, and the geographical area encompassed by the relationship;

C. Whether there was a written distributorship agreement;

D. Whether the distributorship was exclusive;

E. Identify the documents pertaining to the distributor or wholesaler relationship;

F. The extent to which sales to customers in Pennsylvania were handled through distributors or wholesalers as opposed to direct sales by Defendant; and,

G. The extent to which distributors or wholesalers located; outside of Pennsylvania were permitted to sell into Pennsylvania.

RESPONSE:

GM customarily sells its cars, trucks, and replacement parts to authorized dealers and distributors in Pennsylvania and elsewhere, who then resell them. GM understands that plaintiff claims decedent was allegedly exposed to asbestos from brakes during his employment at Colin's Oldsmobile and Cadillac from 1958 to 1961. Invoices for sales of GM replacement parts for that time period are no longer available. GM also objects because the interrogatory is overly broad and burdensome and it asks for irrelevant information.

15. Did this defendant have any sales offices in Pennsylvania. If so, please state as to each such sales office:

A. Its address and years of operation;

B. Identify all managers from 1930 through the present and the years during which they served; and,

C. Identify all sales personnel from 1930 through the present, the years during which they served, and describe each person's sales jurisdiction or responsibility.

RESPONSE:

See answer to 14.