

1. A description of the publications, including the date.
2. The current location of such publications.
3. The custodian of such publications.
4. The method or manner in which such publications are maintained.

RESPONSE:

GM has been a member of numerous organizations from 1930 to the present. Although GM assumes that it received whatever items were forwarded to the general membership of any organization, association or other entity to which it may have belonged over the years, GM has not collected all those publications or compiled a list of them. As a result, GM does not know what each organization may have disseminated. If plaintiff will identify a specific organization, GM will try to determine if it was a member. GM objects to this interrogatory because it is overly broad, burdensome and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 21:

Identify by name and location each plant or manufacturing facility in which the products listed in your answers to Interrogatory Nos. 3-6 were manufactured, 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.

RESPONSE:

See responses to 3, 5 and 6. GM combined asbestos fiber and other ingredients to produce asbestos-containing drum 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 fiber and other ingredients to produce asbestos-