PLAINTIFF'S EXHIBIT

GM-100

21ST JUDICIAL DISTRICT COURT
FOR THE PARISH OF TANGIPAHOA
STATE OF LOUISIANA

BILBO NEWMAN, JR.	§	
	§	
	§	
Plaintiff,	§	
	§	DOCKET NO.: 98-1680
vs.	§	
	§	
OWENS CORNING CORPORATION	§	
aka OWENS-CORNING FIBERGLAS	§	
CORPORATION;	§	
	§	
Defendants.	§	

GENERAL MOTORS CORPORATION'S (GM) RESPONSES TO PLAINTIFFS' MASTER SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO THE MANUFACTURER/DISTRIBUTOR DEFENDANTS

GM is informed plaintiff claims exposure to asbestos containing products while he worked with brake and clutch products. GM's responses are about automotive friction products.

INTERROGATORY NO. 1:

State the name, address, job title, length of time employed by Defendant, and a year-by-year list of all other positions, titles, or jobs held when working for Defendant of each person who has supplied any information used in answering these interrogatories.

RESPONSE TO INTERROGATORY NO. 1:

These responses to plaintiff's interrogatories were verified in accordance with the Rules of Civil Procedure by the person signing the verification form. General Motors prepared these

INTERROGATORY NO. 25:

Has Defendant or any of its subsidiary predecessor companies at any time entered into a "rebranding" or "relabeling" agreement with any other company, either as buyer or seller, including but not limited to other defendants in this cause, concerning asbestos materials or asbestos products? If so, please provide a reasonable description of the agreement(s) and state, as to each such agreement:

(a) The name of the company manufacturing the asbestos products.

(b) The trade name affixed to those products.

(c) The periods of time covered by each such agreement.

(d) The volume, in dollar amount, of each transaction.

(e) The initial purchaser of the products.

(f) The person(s) most knowledgeable regarding such agreements.

RESPONSE TO INTERROGATORY NO. 25:

GM has not found any agreements under which it relabeled asbestos-containing friction products that it manufactured so that another company could sell them. To the extent this interrogatory asks for more information, GM objects because it is vague, overly broad, unduly burdensome and will not lead to admissible evidence.

INTERROGATORY NO. 26:

List the name and address of each company from which Defendant or its subsidiary or predecessor purchased materials or asbestos products which Defendant sold or distributed in the State

of Louisiana, in any form, of the materials, the dates of such purchases, and the ultimate disposal of such materials.

RESPONSE TO INTERROGATORY NO. 26:

GM purchased drum brake linings that others manufactured to install on its automobiles and light duty trucks. To the best of GM's knowledge right now, the following suppliers and approximate dates have been identified, but from information available, it is impossible to determine if all products supplied during the times indicated were asbestos-containing because the presence or absence of asbestos in linings is not reflected in the records from which the following data was obtained.

Since the use of the certification codes began in 1967, these drum brake lining segments have used the name "DELCO." The following are color and certification codes for the years indicated:

SUPPLIER	COLOR	CERTIFICATION	YEARS
Marshall Eclipse	?	None	1949,50
Marshall Eclipse	Blue	None	1949-53
Marshall Eclipse	Gray	None	1949-51
Marshall Eclipse	Orange	None	1951-53
AMCO	Green	501FF	1951-65
AMCO	Green	502FF	1951-65
ABEX	White	401FF	1954-Present
ABEX	Blue	408GG	1954-61
Marshall Eclipse	?		1955-63
Marshall Eclipse	?	308FF	1955-62
ABEX	Red	402GF	1958-Present
Marshall Eclipse	?	309FF	1961-63
Bendix	?	310GG	1963
Bendix	?	311FE	1963
Bendix		301FF	1964-Present
Bendix		302FF	1964-Present
Bendix		327FF	1970-74
Bendix		324FF	1970-Present

ABEX	416FF	1971-81
ABEX	417FF	1971-81
Bendix	325FF	1974-Present
Bendix	336FE	1980
Bendix	337FE	1980

? = Unknown

If used, the date code consists of the last digit of the year and three digits for the day of the year.

Other drum brake lining segments have been purchased from: Bendix (1946-1980), Raybestos-Manhattan (1946-1980) (Certification Code 910-GF for 1971-1975); Unibond (1980-1985); Thermoid Division of H.K. Porter (1974-1980); ITT AMCO (1978-1980); Ferodo (1950s); Multibestos (1950s); Universal Friction (1956-unknown).

Original equipment drum brake lining and shoe assemblies for medium and heavy duty trucks and for buses are purchased either as part of a complete brake assembly or as part of an axle assembly. Engineering information is obtained with regard to these complete assemblies and usually not with regard to their hundreds of components. Therefore, information about the markings on brake linings that GM did not manufacture is generally not available.

Identification of the suppliers of the brake linings for particular trucks and years would involve an extensive search of engineering bills of materials, engineering parts lists, and purchasing records. There are 120-150 rolls of microfilm of engineering bills of materials, 50 boxes of microfiche of engineering parts lists, and 91 rolls of microfilm and 2091 microfiche or purchasing records. From 1979 to present, the engineering parts lists have been supplemented monthly and each supplement would have to be checked to find any new brake assemblies. The process is also complicated because the medium and heavy duty truck business is basically a "customized" business. Practically all heavy duty trucks and most medium duty trucks are ordered to precise customer specifications as to engine,

transmission, axle (including brakes), and other equipment combinations the operator requires. This means that there are numerous regular production options as well as special equipment options created for particular customers.

On the basis of the purchasing records it has searched, GM has identified the following outside suppliers of original equipment brake assemblies and shoe and lining assemblies for 1974 to 1985 (unless otherwise indicated):

Rockwell Brake Division	Buses
Eaton Brake Division	Medium & Heavy Duty Trucks
Wagner Electric (1974-1982)	Heavy Duty Trucks
B.F. Goodrich (1974-1982)	Heavy Duty Trucks
Bendix	Medium Duty Trucks
Dayton-Walther	Medium Duty Trucks
Unibond	Medium Duty Trucks
American Coleman	Medium & Heavy Duty Trucks (Front Driving Axles)
Dana Axle	Medium & Heavy Duty Trucks (Rear Axle Assemblies)
Rockwell Axle Division	Medium & Heavy Duty Trucks (Axle Assemblies)
Kelsey-Hayes	Medium & Heavy Duty Trucks

The following suppliers of replacement brake shoes, linings, and pads for medium and heavy duty trucks and for buses have been identified from available purchasing records:

Abex Corporation	1937-1985
Bendix	1951-1985
Dayton Walther	1983-1985
H.K. Porter	1974-1985
Kelsey Products Division	1981-1985
Rockwell International	1954-1985
Unibond Brake	1973-1985
Wagner Electric	1955-1985
Raybestos Manhattan	1955-1971

Identification markings on these parts can only be ascertained by first identifying part numbers for each brake lining part for each year and then retrieving engineering drawings for each part.

Chrysotile for drum brake linings was purchased from:

Asbestos Fibre Corp. Asbestos Corporation, Ltd. c/o C. L. Zimmerman Co. N-303 Cincinnati Union Terminal Cincinnati, Ohio 45203	1939 - 1975
Asbestos Corp., Ltd.	1967 - 1970
Johns Manville Corp. Box 517 Toledo, Ohio	1975 - 1984
Lake Asbestos of Quebec, Ltd. Box 608 Black Lake, Quebec	1977 - Present
JM Asbestos Sales, Inc. Asbestos, Quebec	1984 - Present

GM has purchased disc brake linings that others manufactured to install on its automobiles and light duty trucks. To the best knowledge of GM right now, the following suppliers and approximate dates have been identified, but from information available, it is impossible to determine if all product supplied during the times indicated were asbestos-containing because the presence or absence of asbestos in linings is not reflected in the records from which the following data was obtained.

The assembly consists of a lining and steel shoe. Markings on linings not manufactured by General Motors:

EDGE CODES NAME CERTIFICATION	COLOR CODE	MFR.	YEARS
GM 333EE	Lavender	Bendix	1974-90
GM 328EE		Bendix	1971-78*
GM 331FE		Bendix	1972-78
DELCO 418		ABEX	1970-79
DELCO 421FF		ABEX	1978-87
DELCO 601FF		Johns-Manville	1965-69
DELCO 602FF		Johns-Manville	1967-69
DELCO 603FF		Johns-Manville	1969
DELCO 604FF		Friction Products Division	1988-1990
DELCO 903FF		Raybestos-Manhattan	1967
DELCO 911FF		Raybestos-Manhattan	1971-1975

*Non-asbestos material with asbestos backing.

Chrysotile for disc brake linings was purchased from:

Asbestos Corp., Ltd.	1967 - 1970
Lake Asbestos	1967 - 1970
Canadian Johns-Manville Asbestos, Quebec	1967 - 1984
National Gypsum Co. Cleveland, Ohio	1972
C. L. Zimmerman Co. 3655 Central Parkway Cincinnati, Ohio	1972 - 1977
Union Insulating Co. Parkersburg, W. Virginia	1976
Chrysler Chemical Division Trenton, Michigan	1978

The suppliers of clutch plates and bands for automatic transmissions since 1964 have been Raymark and Spring-Brummer Division of Borg-Warner Corporation. The suppliers of bands since 1964 have been Spring-Brummer Division or Borg-Warner Corporation and D.A.B Industries. Suppliers of clutch plates are Sheepbridge, Raybestos, Manhattan, Raymark, S.K.Wellman, Thermoset, Borg Warner, and Delco Moraine.

Suppliers of clutch plates for manual transmissions facings were (dates are approximate):

Raymark Industrial Division Southfield, MI	1965 - 1985
H. K. Porter Troy, Michigan	1965 - 1971

Sources of assemblies were (dates approximate):

Borg Warner Corporation Chicago, Ill.	1930 - 1985
Borg & Beck Sterling Heights, MI	1974 - 1984
LUK, Inc. Southfield, MI	1983 - 1985
Alma Products Co. Alma, MI	1974-1985
Daikin (Asahi facings) Troy, MI	Unknown

GM purchased friction materials that it used on clutch plates discs from other companies that were not manufactured by GM. Some of these clutch plates or discs contained asbestos and others did not. GM's understanding of the industry practice is that chrysotile was best suited for and used

in these applications. About 145 different replacement clutch plates or discs are currently distributed by the Service Parts Operations of GM. Below is a list of the part numbers and a description of the replacement clutch plates or discs (as of 1994) that GM has identified as containing asbestos:

GM does not have records that identify all asbestos-containing clutch plates or discs installed as original equipment in millions of cars or trucks or sold as replacement parts from 1950 to 1990. GM has engineering drawings for clutch plates or discs for only part of this period. These drawings generally identify only the supplier and supplier number for the assembly or for the friction material, not the content of the friction material. The formulations that the manufacturers of friction materials use are their trade secrets and are not divulged to GM.

Between 1950 and 1990, both asbestos-containing and non-asbestos-containing clutch plates or discs have been used as original equipment in GM cars and trucks with manual transmissions. Trying to identify all of the friction materials used, by type of car or truck, for that many years would take many person-years of effort. For a particular year and car or truck, one would have to determine what engines and manual transmissions were available, then find engineering parts lists or other documents to identify the part numbers for the clutch assemblies, then obtain the engineering drawings for those assemblies and identify the clutch plate or disc assemblies, and then obtain the engineering drawings for those assemblies. The latter documents may show one or more approved suppliers for the plate or disc or its friction material. Then it would be necessary to try to find purchasing records, if even still available, to determine which supplier was actually used. Because of the huge number of different cars, trucks, engines, and transmissions that GM manufactured and sold from 1950 to 1990, this process would have to be repeated hundreds or thousands of times. The documents needed no longer exist for much of this period and those that do exist are in many

different locations. Furthermore, with respect to heavy duty trucks identified as class four and up, such specific applications excluded asbestos- containing friction materials and instead used cintered metal or ceramic materials.

To the extent this interrogatory asks for more information, GM objects because it is vague, overly broad, unduly burdensome and will not lead to admissible evidence.

INTERROGATORY NO. 27:

Has any employee of answering defendant ever made a claim for asbestos-related pleural disease, asbestosis, mesothelioma, lung cancer or any other cancer under the Occupational Disease or Workmen's Compensation Statute of Louisiana or any other State? If so, state:

a. The date that defendant first received notice of such claim;

b. The total number of such claims per year received to date;

c. The number of such claims for which disability benefits and/or medical expenses were paid by defendant;

d. Identify all persons to whom disability benefits and/or medical expenses were y defendant and the exact medical diagnosis, disease and/or condition for which such benefits/expenses were paid.

RESPONSE TO INTERROGATORY NO. 27:

Records about compensation claims are not all indexed in a way that would let GM isolate claims of a particular illness or among a particular occupation. In addition, GM does not keep workers' compensation records in one central location but, rather, keeps them at or near the plant or office where the claimant worked. Therefore, there is no compilation from which GM can obtain the

RESPONSE TO REQUEST FOR PRODUCTION NO. 59:

GM does not manufacture asbestos-containing thermal insulation products. See also Response to Interrogatory No. 14 and 44 , and Request to Produce No. 58. GM objects to this request because it is vague, overly broad, unduly burdensome and will not lead to admissible evidence.

Respectfully submitted,

BERNARD, CASSISA, ELLIOTT & DAVIS
A Professional Law Corporation

BY: _____

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CERTIFICATE OF SERVICE

I do hereby certify that I have on this _____ day of _____, 20___ served a copy of the foregoing pleading on counsel for all parties to this proceeding, by mailing the same by United States mail, properly addressed, and first class postage prepaid.

_____

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March 23, 2001

SLF

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Re: Bilbo Newman, Jr. vs
Owens-Corning, et al
Docket No. 98-1680
Division "A"
21st JDC, Parish of Tangipahoa
State of Louisiana

Dear Ms. Jeter:

We are pleased to transmit copy of GM's Answers to Plaintiff's Master Set of Interrogatories and Request for Production directed to the manufacturer/distributor defendants.

Pursuant to local rules, we have retained the **ORIGINAL** of that pleading in our files.

By copy of this letter to all other known counsel of record, GM is giving notice of its responses to plaintiff's discovery. Those who wish to receive copies of GM's responses to this discovery may obtain a copy by contacting Margaret Cassisa in our office.

With best wishes,

Very truly yours,

BERNARD, CASSISA, ELLIOTT & DAVIS
A Professional Law Corporation

BY: Paul V. Cassisa Sr.
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