

- (c) Trade Names: AC Delco, Delco Moraine, GM Parts, Goodwrench.
- (d) See responses to (a) and (c).
- (e) The grades of chrysotile asbestos used in disc brake linings purchased by GM is unknown. The specific formulations used in the manufacture of brake linings are valuable proprietary information that are disclosed only within GM on a need-to-know basis. These formulations are the result of decades of investment of time and money and their disclosure would put GM at a serious competitive disadvantage because domestic and foreign competitors could duplicate GM's products without having to undertake the lengthy and expensive laboratory and vehicle testing programs undertaken by GM. Competitors could also use this information to improve their products and processing methods without having to compensate GM for its efforts. For these reasons, GM objects to the disclosure of the details of its formulations.
- (f) GM stopped manufacturing these linings in 1985 because of production priorities but continues to sell them.
- (g) Not applicable.
- (h) Disc brake linings segments are a dense grayish or tan material. Typical dimensions are height of 57-63 millimeters, width of 125-142 millimeters, and thickness of 11-13 millimeters.
- (i) Disc brake linings are one component of a vehicle braking system.
- (j) GM distributed asbestos-containing linings from 1966 to present.

Clutch Plates and Bands for Automatic Transmissions:

- (a) Automatic transmissions were introduced in GM model year 1940. Clutch plates and bands containing asbestos were used as early as 1946, according to available information. GM (Delco Moraine) manufactured some of the band material (approximately 1965-1979) and the rest were purchased. See (e).
- (b) See responses to (a) and (c).