

products? If so, state the date that such research plan was begun and when such asbestos-free product was first placed on the market.

RESPONSE:

Brake linings that did not contain asbestos were used on GM cars and trucks before the introduction of asbestos-containing linings in the 1920s, and some disc and drum brake linings from 1980 to present, and in special applications, like police cars, at other times. Brake linings that do not contain asbestos have different performance characteristics and are used in brake systems that are designed to match those characteristics. Therefore, non-asbestos linings are not a "substitute." GM objects because the interrogatory is vague, ambiguous, argumentative and is not reasonably calculated to lead to the discovery of admissible evidence. GM also objects because the interrogatory is burdensome, harassing and oppressive.

INTERROGATORY NO. 53:

Did your company or its predecessor(s) or subsidiaries ever recall any products containing asbestos from the market or stream of commerce? If so, state:

- A. All details of such recall;
- B. The name of the product recalled, including the reason for the recall and the names and current addresses of those individuals who determined that it should take place;
- C. The dates of recall;
- D. The purpose for the recall.

RESPONSE:

GM has not recalled an asbestos-containing brake lining or clutch facing for any reason relating to its asbestos content.