

GM in Dayton, Ohio. GM objects to this interrogatory because it is overly broad, unduly burdensome, not relevant and not reasonably calculated to lead to the discovery of admissible evidence.

18. Does a patent exist or did a patent exist for any of the products listed in answer to Interrogatory No. 14? If so, for each such product, please state:
- A. The product name and number of its patent;
 - B. The date same was issued; and,
 - C. The product name and number of each patent application that is pending.

RESPONSE:

Some patents may exist for the more than sixty year period GM has manufactured brake linings. Those patents are public records available from the Patent Office. GM objects to this interrogatory because it is overly broad, unduly burdensome, not relevant and not reasonably calculated to lead to the discovery of admissible evidence.

19. Please state the name and address of each business entity from whom the Defendant, Defendant's predecessors or Defendant's subsidiaries have ever bought or received raw asbestos fiber, and as to each such transaction please state the following:
- A. The date of each sale or providing of asbestos fiber, as well as the amount received;
 - B. The seller or provider of the asbestos fiber;
 - C. The type of asbestos fiber sold or provided (e.g., amosite; chrysolite, or crocidolite);
 - D. The use made of each sale or supply of asbestos fiber; and,
 - E. Identify all documents relating to the purchase or receipt of raw asbestos fiber.

RESPONSE:

Chrysotile fiber used in the manufacture of drum brake linings was obtained from: