

RESPONSE:

See response to 32.

INTERROGATORY NO. 35:

Prior to 1968, did any person file a claim against a Worker's Compensation carrier covering Defendant or any of its subsidiaries or predecessors alleging that he/she contracted a disease from inhaling asbestos fibers? If so, provide:

- (a) A list of the claims, including each claimant's name, address and the date each claim was filed, and including the caption and jurisdiction of the claim.
- (b) The disease alleged in each such claim.
- (c) A brief summary of the disposition of each such claim.
- (d) The name, address and title of the person having custody of the records pertaining to each such claim.

RESPONSE:

Records about compensation claims are not all indexed in a way that would let General Motors isolate claims of a particular illness or among a particular occupation. In addition, General Motors does not maintain 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 General Motors can obtain the information necessary to respond to this interrogatory. General Motors will make workers' compensation claims records available for review by plaintiffs' lawyer, at the locations where they are maintained, at mutually convenient times. General Motors objects because this interrogatory asks for information that will not lead to admissible