

37. Has defendant ever had a department or departments which had responsibility for, or were engaged in, the preparation and dissemination of warnings and/or instructions respecting health hazards relative to asbestos exposure, to auto dealerships, service stations, repair shops and/or to auto workers and/or members of the general public? If so, state as to each applicable department:

- (a) the name and address of the department;
- (b) the dates each such department was so involved;
- (c) a detailed description of all activities conducted by each said department;
- (d) the name, address and present job title of the party responsible for such department at any time from 1920 to the present;
- (e) a detailed description of all actions undertaken by defendant as a result of any report or communication received from said department;
- (f) the annual cost of the department;
- (g) the title, author, date and substance of all reports or any other written communications promulgated or drafted in said department, as well as the name, address, and job title of the present custodian of all such reports or communications (or alternatively attach copies of same hereto);
- (h) the substance of all oral reports or communications by said department as well as the name, address, and job title of the parties involved in said report or communication;
- (i) the title, author, date of issue, and substance of any and all warnings and/or instructions promulgated, drafted or disseminated by the department.

ANSWER:

See answer to Interrogatory 10(e), supra, for the substance of current warnings and instructions issued by GM.

- (a) GM has departments which are responsible for the preparation and dissemination of warnings and instructions relating to GM products. However, there is no single department specifically charged with responsibility for the development of warnings regarding "health hazards relative to asbestos exposure".

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