A. The dates of each such meeting.

B. The general subject matter discussed at each meeting.

C. Who was in attendance at each meeting.

D. Where and by whom the written minutes are presently maintained.

E. By whom the minutes were taken and put into final format.

F. Whether the minutes were abstracted and reports disseminated to other individuals, and if so, the names and job titles of those individuals.

RESPONSE:

GM found no meeting minutes of the Board of Directors on the subject of asbestos and health. GM objects because this interrogatory is overly broad, burdensome, vague, ambiguous, and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 37:

Do you or any of your subsidiaries, including foreign business entities, currently manufacture any products containing asbestos? If so, state:

A. As to each product, whether such product is mined, manufactured, and/or marketed or sold.

B. The names and addresses of the companies mining, manufacturing, marketing, and/or selling each of those products.

C. The trade or brand name of each of those products mined, manufactured, marketed, and/or sold.

D. The date each of the named products was placed on the market.

E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product.

F. A description of the physical appearance of each product and its packaging.

G. A detailed description of the intended uses of each of the named products.