

REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce a true and correct copy of each photograph of each asbestos-containing product identified in answer to Interrogatory No. 4.

RESPONSE:

Illustrations or sketches of products are included in the service manuals and advertising samples described in GM's responses to interrogatories. GM objects to this request because it is overly broad, burdensome and oppressive in its scope and it is vague, ambiguous and not reasonably particular about what is being requested.

REQUEST FOR PRODUCTION NO. 2:

Please produce any diagrams or schematics indicating, stating or detailing the existence of any of your subsidiaries, predecessors, or divisions as defined on Page 1 of these Interrogatories and Request for Production.

RESPONSE:

As one would expect in an organization that has existed since 1916, conducting operations throughout the U.S.A and several other countries, with numerous divisions that have in the past or now exist and/or that have been, in some manner over the years, reorganized, and conducts many different types of business operations, GM has many documents that might be considered to depict its organization format(s). However, the vast majority of