

this interrogatory because it is vague, burdensome, broad, and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 49:

Does your company have, or has it ever had, or have your predecessor(s) or subsidiaries ever had, a Medical Department? If so, state:

- A. The year such Medical Department was established;
- B. Whether or not such Medical Department has operated continuously since being established;
- C. The name of each director, chief, or head of your Medical Department year by year, beginning with the first year you had a Medical Director or Medical Department, and the last known address and phone number of each;
- D. State the duties and responsibilities of such Medical Department.

RESPONSE:

There are medical departments at many GM plants and other units, some of which have been in operation since the incorporation of GM. There is no list of all of the directors of these many medical departments since the date of their organization. *See also* response to 18.

To the extent this interrogatory asks for more information, GM objects because it is vague, ambiguous, overly broad, burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 50:

Did your company or its predecessor(s) or subsidiaries ever place any warning directly on any of its asbestos-containing product or on their packaging. If so, identify the product(s) and year said warning was first applied.