REQUEST FOR PRODUCTION NO. 7:

All documents which support, contradict, or are otherwise relevant to Plaintiffs' claims of exposure to Defendants' products at any worksite identified in Plaintiffs' response to discovery.

RESPONSE:

GM cannot respond to this request because its investigation and discovery are not completed and plaintiffs have not provided sufficient information regarding their claims and work histories. GM objects to this interrogatory because it is vague, ambiguous, burdensome and unlikely to lead to admissible evidence.