

RESPONSE:

See response to 14.

INTERROGATORY NO. 51:

Did your company or its predecessor(s) or subsidiaries ever stamp or place the name of the company, its initials, or any identifying logo on any of its asbestos-containing products? If so, please state the name brand names of such products, a description of such stamp or logo and the dates such were placed on the referred products.

RESPONSE:

Brake linings have contained an edge code and certification number since about 1967. For drum brake linings that GM manufactures, the edge code is "DELCO" and the certification code begins with "2." For disc brake linings, the edge code is "DM" and the certification code begins with "1" or "2."

Drum brake shoes GM manufactures have contained the marks "Delco Moraine" or "DM" or a logo that depicts the outline of two brake shoes. Drum brake shoes with these markings may be relined by various manufacturers with non-GM linings.

Before 1974, some clutch facings that GM assembled had a "GM" marking on the facing. Current manual transmission clutch facings do not have identification markings.

GM also objects because this interrogatory is overly broad, burdensome and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 52:

Has your company, or your predecessor(s) or subsidiaries, ever devised a research plan to develop, or actually developed or had developed, a product which did not contain asbestos and which could be substituted for one or more of your asbestos-containing