

the air sampling at Circle Buick, New York, New York; West Side Pontiac, New York, New York and Circle Buick - East, New York, New York. On February 13, 1984, W. H. Krebs did air sampling to evaluate the nature and extent of operator exposures to airborne asbestos while performing brake lining resurfacing operations at Pekin Machine & Parts Company, Pekin, Illinois. GM will produce copies of the reports. To the extent this interrogatory asks for additional information, GM objects to this interrogatory because it is vague, overly broad and burdensome. It also asks for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 9:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the testing of the products referred to in Interrogatory No. 6 now exist? If so, state:

- (a) A description of each such document.
- (b) The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

RESPONSE:

See response to 8.

INTERROGATORY NO. 10:

Did Defendant or any of its predecessor or subsidiary companies make any design changes or modifications as a result of those tests described in responses to Interrogatory No. 8? If the answer is affirmative, state:

- (a) The trade names of the products changed.
- (b) The nature of the changes made and the date of such changes or modifications.