RESPONSE:

GM manufactured asbestos-containing drum and disc brake linings at plants operated by Inland Division (later Delco Products and Delco Chassis divisions) in Dayton, Ohio (1939-1964) and Vandalia, Ohio (1962-present) and Delco Moraine Division (1966-1985) in Dayton, Ohio.

11. Has Defendant, Defendant's predecessors or any of Defendant's subsidiary companies, at any time, engaged in the mining, milling and/or subsequent sale of asbestos fiber? If so, please state:

    A. The date such activity began;

    B. The years during which such activity took place;

    C. The date when such activity was terminated;

    D. If such activity was terminated, the reason why;

    E. The geographical area into which you claim the asbestos was sold; and,

    F. Identify the organizational unit of Defendant, the predecessor or subsidiary so engaged.

RESPONSE:

No.

12. Has Defendant, Defendant's predecessors or any of Defendant's subsidiary companies, at any time, engaged in the marketing and/or sale of any asbestos-containing product? If so, please; state:

    A. The date such activity began;

    B. The years during which such activity took place;

    C. The date when such activity was terminated;

    D. If such activity was terminated, the reason why; and,