RESPONSE:

See response to 10, a nearly identical and entirely overlapping question.

INTERROGATORY NO. 14:

Has Defendant or any of its predecessor or subsidiary companies at any time published or distributed any printed material, including brochures, pamphlets, catalogs, packaging or other written material or any kind or character containing any warnings concerning the possibility of injury resulting from the use of the asbestos-containing products listed in Interrogatory No. 6? If so, state:

(a) The names of each relevant product.

(b) The exact wording of each warning statement on each printed material.

(c) A description of the printed material other than the warning statement.

(d) The method used to distribute the warning to persons likely to use the product.

(e) The date each warning was first issued, distributed, or placed on packaging.

(f) The name, address, and job title of each person responsible for having drafted or issued the warning.

(g) The current location of any such printed material and the custodian thereof.

(h) The form in which such literature or printed material can be accessed, i.e, the manner in which such literature is indexed or stored.

RESPONSE:

In 1975, GM began placing a caution, with language copied from the OSHA regulation, on packages of replacement brake linings. It read:

"CAUTION: CONTAINS ASBESTOS FIBERS. AVOID CREATING DUST. BREATHING ASBESTOS DUST MAY CAUSE SERIOUS BODILY HARM."