

- (c) The name, address, and job title of each person responsible for having caused a change to be made, or having made a change or modification.

RESPONSE:

Design changes to brake linings were not made because of air sampling for asbestos exposure level testing or measurements. GM objects to this interrogatory because it is vague, ambiguous, overly broad, unduly burdensome, and will not lead to admissible evidence.

INTERROGATORY NO. 11:

After releasing the products listed in Interrogatory No. 6 to the public, were any tests conducted on them to determine potential health hazards resulting from the use of or exposure to the materials, such as asbestos, contained in those products? If the answer is affirmative, state:

- (a) The names of the products tested and the dates of such tests.
- (b) The name, address, and job title of each person who conducted those tests.
- (c) The results of those tests.
- (d) Whether, as a result of the tests, any products were removed from the market.
- (e) The names of all products removed from the market as a result of these tests.

RESPONSE:

GM conducted testing within its own facilities. See response to 8.

INTERROGATORY NO. 12:

Do any documents, including written memoranda, specifications, recommendations, blueprints, or other written materials of any kind