

- (d) Each of Defendant's defenses enumerated in Defendant's last filed Answer in each of these cases.

RESPONSE:

GM objects to this interrogatory because it asks for legal opinions or conclusions about what constitutes "relevant facts," information protected from disclosure by the work product doctrine.

INTERROGATORY NO. 62:

Please identify documents which will be used at time of trial, (Exhibit List, Deposition List, which are relevant to each of Defendant's enumerated defenses in Defendant's last filed Answer.

RESPONSE:

See response to 60.

INTERROGATORY NO. 63:

Please state when you first received a copy of the Fleischer/Drinker Report published in 1945/1946.

RESPONSE:

GM does not know when it first received the report and who at GM received it.

GM objects to this request because it is vague, ambiguous, overly broad, and is not reasonably calculated to lead to the discovery of admissible evidence.