PARICHAN, RENBERG, CROSSMAN & HARVEY
LAW CORPORATION
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(d) Defendant incorporates its response to interrogatory eight (8) (IV) (d);

(e) The shoe and lining assembly consists of the lining segment, described in response to, and a steel shoe to which the segment is attached by rivets or bonding. Drum brake shoes manufactured by General Motors Corporation had the words "Delco Moraine" or "DM" or "GM" or a logo depicting a split ring. Identification markings on the lining segments are described in the response to interrogatory eight (8) (IV) (e).

Assemblies were "crown ground" beginning in 1970 to assure proper break-in. To prevent damage to these premium linings, the words "DO NOT GRIND" were stamped on the lining surface of assemblies commencing in 1970 for parts distributed under the Delco name and 1974 for parts distributed under the GM Parts name. The marking was discontinued in 1983;

(f) Defendant incorporates its response to the immediately proceeding interrogatory sub-interrogatory;

(g) A drum brake shoe and lining assembly is used as part of the brake system of a motor vehicle.

(h) This information is presently unknown to General Motors Corporation;

(j) See response under (I) above.

VI

DRUM BRAKE SHOE\LINING ASSEMBLIES FOR MEDIUM\HEAVY DUTY TRUCKS OR TRAILERS AND BUSES\COACHES SOLD OR DISTRIBUTED BY GENERAL MOTORS CORPORATION

(a) Drum brake shoe and lining assemblies for medium and heavy duty trucks and for coaches with brand names GM Parts (1977-present) or GMC Truck (prior to 1977);

(b) Approximately 1930;

(c) Not applicable;

(d) The precise asbestos content of lining segments manufactured by others is proprietary information not available to General Motors Corporation. It is known in industry practice, however, to use chrysotile asbestos in amounts comparable to those in lining segments manufactured by General Motors. General Motors knowledge of industry practices based on the education and experience of its engineers and other employees in publish literature on friction materials;