FILE NAME: General Motors (GM)

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IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

IN RE: ALL GOLDENBERG, MILLER, HELLER & ANTOGNOLI, P.C.	)
Plaintiffs,	)
vs.	)
A. W. CHESTERTON, INC., et al.	)
Defendants.	)

GENERAL MOTORS CORPORATION'S SUPPLEMENTAL RESPONSE TO PLAINTIFFS' DISCOVERY REQUESTS IN RESPONSE TO THE COURT'S APRIL 25, 2006 ORDER

General Motors Corporation ("GM") has made a reasonable and diligent search of information and/or documents in GM's possession or control in compliance with the April 25, 2006 Order (the "Order")S. The Order requires that GM "either produce or assert work product/attorney client privilege claims regarding the following documents or information:"

1. Contracts for consulting services related to asbestos litigation entered into with Dennis Paustenbach, Brent Finley, Patrick Hessel, Michael Goodman, Mary Jane Teta and David Garbrant ... , or with Exponent, Inc., Chemrisk, Inc., or Epilung Consulting for the services of the Experts.

GM Response: Following a reasonable and diligent search of information and/or documents in GM's possession or control in compliance with the April 25, 2006 Order (the "Order") , GM did not locate any non-privileged documents responsive to this request. *See* Privilege Log, attached as Exhibit A.

2. Communications with the Experts, including drafts of reports and presentations, which discuss or identify work performed regarding GM's defense of asbestos friction litigation claims, excluding documents that contain only case specific information.

GM Response: Following a reasonable and diligent search of information and/or documents in GM's possession or control in compliance with the April 25, 2006 Order (the "Order"), GM did not locate any non-privileged documents responsive to this request. *See* Privilege Log, attached as Exhibit A.

3. The total amount that GM paid the Experts in connection with the defense of asbestos friction litigation claims from January 1, 2001 to the present.

GM Response: GM conducted a reasonable and diligent search of information and/or documents in GM's possession or control in compliance with the April 25, 2006 Order (the "Order"). The following results of that search include information related to both case-related and generic payments to Dennis Paustenbach, Brent Finley, Patrick Hessel, Michael Goodman, Mary Jane Teta, David Garabrant, Exponent, Inc., Chemrisk, Inc., or Epilung Consulting for work performed from January 1, 2001 to April 28, 2006 that may be classified as "in connection with the defense of asbestos friction litigation claims ..." as required by Court Order. GM does not have knowledge if or how payments made to the above named individuals or entities were dispersed after GM made such payments.

GM and/or GM's counsel on GM's behalf directly made payments to Mr. Dennis Paustenbach for the time period in question and in connection with the defense of asbestos friction litigation claims, in the following amounts: $274,784.09 in 2004; $286.90 in 2005.

Neither GM nor GM's counsel on GM's behalf made any payments directly to Mr. Brent Finley for the time period in question.

GM and/or GM's counsel on GM's behalf directly made payments to Mr. Patrick Hessel for the time period in question and in connection with the defense of asbestos friction litigation claims, in the following amounts: $3,221.24 in 2006.

GM and/or GM's counsel on GM's behalf directly made payments to Mr. Michael Goodman for the time period in question and in connection with the defense of asbestos friction litigation claims, in the following amounts: $7,964.60 in 2005.

Neither GM nor GM's counsel on GM's behalf made any payments directly to Ms. Mary Jane Teta for the time period in question

GM and/or GM's counsel on GM's behalf directly made payments to Mr. David Garabrant for the time period in question and in connection with the defense of asbestos friction litigation claims, in the following amounts: $61.99 in 2003; $63,591.84 in 2004; $10,381.10 in 2005.

GM and/or GM's counsel on GM's behalf directly made payments to Exponent, Inc., for the time period in question and in connection with the defense of asbestos friction litigation claims, in the following amounts: $1,244,565.71 in 2002; $1,024,813.47 in 2003; $1,577,364.77 in 2004; $1,407, 580.79 in 2005; $153,662.03 in 2006.

GM and/or GM's counsel on GM's behalf directly made payments to Chemrisk, Inc., for the time period in question and in connection with the defense of asbestos friction litigation claims, in the following amounts: $7,509.34 in 2003; $599,210.02 in 2004; $1,138, 879.02 in 2005; $202,310.41 in 2006.

GM and/or GM's counsel on GM's behalf directly made payments to Epilung Consulting for the time period in question and in connection with the defense of asbestos friction litigation claims, in the following amounts: $40,018.42 in 2004; $132,397.31 in 2005; $31,868.45 in 2006.

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By:_____

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