

Alabama, Florida, Mississippi, Oregon, Washington, Georgia, Tennessee, Texas and Virginia? If so, state:

- (a) The name and address of each such distributor or sales representatives.
- (b) The years in which such company or person distributed, marketed, or sold your products.
- (c) What products were distributed, marketed, or sold and in what years.

ANSWER:

Defendant objects to Interrogatory No. 17 to the extent it is overly broad, general and global and inquires of "predecessor" and "successor" companies without defining such. For this reason, the interrogatory also inquires of information which is irrelevant and immaterial and the interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Further, the question calls for a legal conclusion as to the status of a "predecessor" company without setting forth a factual basis or foundation for such an opinion. Further, the interrogatory inquires of products other than those listed in response to Interrogatory No. 6 and is, therefore, overly broad, general and global. Finally, the interrogatory seeks information which is neither relevant nor material to any issue in this case and is not reasonably calculated to lead to the discovery of admissible evidence at the trial of this lawsuit. Subject to and without waiving the foregoing objections, Defendant does not have possession, custody, or control of the detailed information requested in (a), (b) and (c), above. GM customarily sells its products to GM dealers and warehouse distributors. Invoices for the sale of replacement parts for most, if not all, of the time period during which plaintiff allegedly performed brake repairs are not available. If Plaintiff will more particularly identify a particular city for a part of that period, GM will attempt to respond further.

- 18. List each employee (including only physicians and/or hygienists) who has acted in a medical advisory capacity to your company at any time during the past 40 years, including, but not limited to, physicians and industrial hygienists, and the current address, telephone number and job title of each of those individuals and who has, had or may have had any knowledge regarding the hazards of asbestos.