

- g) a detailed description of the product, including pictures of the product itself, pictures of the product's packaging, copies of catalogue description of the product and copies of the manufacturer's instructions for the proper installation or application of the product;
- h) attach copies of the documents reflecting the sale, supply or delivery to entity listed;
- i) during the time period when this defendant was supplying the asbestos-containing product, was it also manufacturing, supplying or marketing an asbestos-free variety of the same product to the entity in question;
- j) during the time period in which this defendant was supplying the asbestos-containing product to the entity in question, was it also manufacturing or marketing any asbestos-free variety of the same product in any market area;
- k) what was the first year that an asbestos-free version of the product in question was supplied by' this defendant.

RESPONSE:

As to drum brake linings manufactured by GM:

(a)-(b) United Motors (1918-1961), United Delco (1961-1974), AC-Delco (1974-present), Delco Moraine (1942-present), GM Parts (unknown date before 1969-present), Goodwrench (1985), Buick*, Cadillac*, Chevrolet*, GMC Truck*, Oldsmobile*, or Pontiac*. Dates are approximate. Names marked with an asterisk were used, if at all, for an unknown period of time before 1969.

(c)-(d) GM drum brake linings contain one or more grades of chrysotile asbestos, generally grades 5, 6 and 7, and the approximate percentage by weight ranged between 50% to 75%.

(e) GM.

(f) GM objects to this interrogatory because it is overly broad and not reasonably calculated to lead to admissible evidence.

(g) Drum brake lining segments consist of a curved, dense, grayish material. Typical arc lengths range from 90° to 130° and are for drum diameters of 7, 8, 9-1/2, 11, 12 and 12-1/2 inches. GM's recommendations for maintaining and servicing brake linings are contained in numerous service manuals. GM will provide excerpts from a typical service manual about drum brake lining installation.