

INTERROGATORY NO. 2:

State whether or not you are a corporation. If so, state your correct corporate name, the state of your incorporation, the address of your principal place of business, the name and address of the person or entity authorized to accept service of process on your behalf, and whether or not you have ever held a Certificate of Authority to do business in the State of Texas.

RESPONSE:

General Motors Corporation is incorporated in Delaware. Its principal place of business is 3044 West Grand Boulevard, Detroit, Michigan 48202. CT Corporation, 350 N. St. Paul Street, Suite 2900, Dallas, Texas 75201, is authorized to accept service of process on behalf of General Motors Corporation, in the State of Texas. GM has been authorized to do business in the State of Texas since December 12, 1941.

INTERROGATORY NO. 3:

Has Defendant or any of its predecessor or subsidiary companies at any time engaged in the mining and subsequent sale of material containing asbestos fibers? If so, identify the location of the mine(s), the years of its operation, the type of asbestos mined and whether you sold any asbestos to any Defendants in the Dallas County asbestos litigation.

RESPONSE:

GM has not mined or sold asbestos. *See also* response to 4.

INTERROGATORY NO. 4:

Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time manufactured or sold.