

because it is overly broad, unduly burdensome, irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 8:

Before distributing, selling, or placing the products listed in your responses to Interrogatory Nos. 3-6 into the streams of commerce, were any tests conducted to determine potential health hazards involved in the use of, or exposure to, the materials such as asbestos, contained in those products? If the answer is affirmative, state:

- A. The names of the products tested and the date of each test.
- B. The name, address, and job title of each person conducting the tests or involved with conducting the tests.
- C. The results of the tests.

RESPONSE:

GM does not know of any study establishing that potential exposures to asbestos during brake repair operations constitute a health hazard. However, GM conducted air sampling for asbestos during routine brake maintenance operations and found that the exposures, if any, were below the permissible exposure limit. GM has also conducted a study that showed the emissions from brakes are substantially less than one percent asbestos. GM will make copies available for inspection at the office of its counsel at a mutually convenient time. *See also* response to 8. GM objects to this interrogatory because it is overly broad, argumentative and not likely to lead to admissible evidence.

INTERROGATORY NO. 9:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the testing of the products referred to in Interrogatory No. 6 now exist? If so, state: