

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. The interrogatory is also multifarious and seeks to impose upon Defendant an undue burden in the form of unnecessary time, expense and manpower. Moreover, the interrogatory is not limited in time and seeks information which is irrelevant and immaterial to any issue in this lawsuit. For these reasons, the interrogatory is harassing and oppressive. Subject to and without waiving the foregoing objections, brake linings and clutch assemblies, some in use for over sixty years, have been advertised during this period. Copies of all advertisements and details about their publication have not been kept. GM will attempt, however, to provide a copy of some representative advertising.

23. Have any written or printed materials or instructions of any kind or character been prepared by Defendant or any of its subsidiary or predecessor companies or their agents indicating how asbestos products should be used and maintained? If so, state:
- (a) The name, address, and job title of each person who prepared such materials or instructions or assisted in their preparation.
 - (b) The name, address and job title of each person who currently has possession of such materials or instructions and their present location.
 - (c) The dates of distribution or use and the manner in which such materials or instructions were distributed to purchasers of Defendant's products or those of its subsidiaries or predecessors.
 - (d) The year each such written material or instruction was prepared and disclosed to potential consumers.

ANSWER:

Defendant objects to Interrogatory No. 23 to the extent it is overly broad, general and global and inquires of "predecessor" 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