

- (e) The name and address of each attorney who represents each individual making a claim.
- (f) The style and court number of each claim.
- (g) The disposition of each claim that has been settled or taken to judgment.

ANSWER:

Defendant objects to Interrogatory No. 15 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 forth a factual basis or foundation for such an opinion. Moreover, the interrogatory is multifarious and requests information which is irrelevant, immaterial regarding claimants other than Plaintiffs herein and which is a matter of public record and easily accessible to Plaintiffs. Finally, the interrogatory fails to limit its inquiry to injuries allegedly resulting from the exposure to asbestos from the products listed in response to Interrogatory No. 6. Subject to and without waiving the foregoing objections, Defendant has no record of any product liability lawsuit or claim alleging injury from exposure to asbestos from a GM product before 1970.

16. Were your asbestos products distributed, marketed, packaged, labeled and/or sold by companies other than your own? If the answer is affirmative, list the names and addresses of each of those companies, and the products in question.

ANSWER:

GM customarily sells its cars, trucks, and replacement parts to authorized dealers and distributors in Texas and elsewhere, who then resell them. They are not purchased by consumers directly from GM. Records relating to GM's sale of replacement parts for most of the time period inquired of are no longer available. GM does not maintain records of sales of parts by dealers or distributors.

17. Did you or any of your predecessors, successors, or subsidiaries have any distributors or sales representatives of asbestos products in the States of