

PRELIMINARY STATEMENT

These interrogatories improperly inquire about products which have been manufactured, marketed or sold over a span of some sixty (60) years. As a result, many of the individuals who might have had personal knowledge of the matters to which these interrogatories relate are deceased or are otherwise unavailable to General Motors Corporation and investigations to date indicate that at least some documents which might relate to matters inquired into by these interrogatories may have been destroyed pursuant to General Motors Corporation's normal record retention policy or are otherwise unable to be found. General Motors Corporation is engaged in a continuing investigation in an attempt to locate or confirm the absence of such documents and is also engaged in a continuing investigation with respect to the matters inquired into by these interrogatories. Unless otherwise stated in an answer to a specific Interrogatory, the answers set out hereinafter are limited to the period of time during which General Motors Corporation manufactured asbestos-containing products and to the facilities related to that business. The following is a part of and is incorporated by reference into every answer provided hereafter:

This answer is accurate as of the date made. However, General Motors Corporation's investigation is continuing and General Motors Corporation cannot exclude the possibility that it may be able to obtain more complete information or even information which indicates that the answer being supplied is incorrect. General Motors Corporation objects to answering this Interrogatory in regard to any period of time other than the period during which it engaged in the manufacture of the asbestos-containing product(s) involved in this case or concerning any facility not related to that business, on the basis that any such answer would be