or people who do repairs. GM objects to the rest of this interrogatory because it is vague, ambiguous, overly broad, unduly burdensome and irrelevant.

INTERROGATORY NO. 29:

As to gastro-intestinal cancer, laryngeal cancer, pharyngeal cancer or lymphatic cancer, state:

(a) The type of cancer and the date on which Defendant or its subsidiary or predecessor first learned that such diseases were caused by inhalation of asbestos fibers by humans.

(b) What cancers has the Defendant or its subsidiary or predecessor become aware can be caused by exposure to asbestos fibers?

(c) The date on which Defendant first suspected other cancers were caused by asbestos inhalation.

(d) Who within the company or its subsidiary or predecessor first discovered the adverse consequences or effects of asbestos exposure.

(e) What information was disseminated with Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

(f) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.

(g) Who is the custodian of such information.

RESPONSE:

Gastro-intestinal, laryngeal, pharyngeal, and lymphatic cancers have been theorized to have many different causes. GM cannot determine when any of its present or past employees may have first heard of a theory that one of these cancers was caused by or associated with some type of asbestos exposure. However, to the best of GM's knowledge, there is no recognized, scientific