

for the trial strategies and tactics of counsel and other similar information that is protected by the attorney work product doctrine. GM also objects to this request because it is overly broad, unduly burdensome, and improper.

INTERROGATORY NO. 40:

Have Defendant or its subsidiaries or predecessors ever acquired through purchase, reorganization, or merger another corporation, company, or business which manufactured, sold, processed, distributed, or contracted or supplied products containing asbestos? If so, for each such entity, state:

- (a) Full and correct name;
- (b) Principal place of business;
- (c) State of incorporation;

RESPONSE:

GM acquired the assets of the Bondall Company, 500 Bittner Street, St. Louis, Missouri, in 1939. Bondall designed and manufactured brake linings and clutch facings. GM objects to this interrogatory because it asks for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 41:

Was each of your asbestos products generally expected to reach, or packaged to reach, the consumer or user, without substantial change in the condition in which it was sold? If not, with respect to any such product, explain in what way the Defendant claims its products were altered or substantially changed after sale or distribution and before reaching the user.