

RESPONSE:

GM does not have this information and, because its records of worker's compensation claims are located at or near its plants throughout the United States and are not generally arranged by type of disease, GM has no reasonable and practical method to determine that date. GM objects because this interrogatory asks for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. The interrogatory is also overly broad, burdensome and harassing.

31. What was the date of the first worker's compensation claim filed against this defendant for Mesothelioma?

RESPONSE:

See answer to 30.

32. What was the date of the first (non-worker's compensation) lawsuit filed against this defendant for an asbestos-related disease?

RESPONSE:

The first lawsuit served on GM claiming an alleged asbestos-related disease from exposure to asbestos from brake linings was in 1977.

33. What was the date of the first (non-worker's compensation) lawsuit filed against this defendant for Mesothelioma?

RESPONSE:

A product liability lawsuit against GM involving mesothelioma allegedly caused by exposure to asbestos from brakelinings was filed in 1981. GM does not have records or information to identify the first case with certainty.