

ANSWER:

Defendant objects to Interrogatory No. 50 to the extent it inquires of "predecessor companies" without identifying or defining such. Moreover, the interrogatory calls for a legal conclusion as to what companies are "predecessors" without setting forth a factual or legal foundation for such an opinion. Further, the interrogatory is duplicative of other interrogatories, specifically Nos. 14 and 23, and is, therefore, oppressive and harassing. The interrogatory is also overly broad, general and global in that it is not limited in time or to those products listed in response to Interrogatory No. 6. Subject to and without waiving the foregoing objections, please see Defendant's responses to Interrogatory No.s 14 and 23, which responses are incorporated herein by reference as if restated verbatim.

51. Did your company or its predecessor(s) or subsidiaries ever stamp or place the name of the company, its initials, or any identifying logo on any of its asbestos-containing products? If so, please state the name brand names of such products, a description of such stamp or logo and the dates such were placed on the referred products.

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Defendant objects to Interrogatory No. 51 to the extent it inquires of "predecessor companies" without identifying or defining such. Moreover, the interrogatory calls for a legal conclusion as to what companies are "predecessors" without setting forth a factual or legal foundation for such an opinion. Further, the interrogatory is overbroad, general and global and is not limited to those products listed in response to Interrogatory No. 6. The interrogatory also seeks information which is neither relevant nor material to any issue in this case and is not reasonably calculated to lead to the discovery of admissible evidence at the trial of this lawsuit and seeks information protected. Subject to and without waiving the foregoing objections, brake linings have contained an edge code and certification number since about 1967. For drum brake linings manufactured by GM, the edge code is "DELCO" and the certification code begins with "2." For disc brake linings, the edge code is "DM" and the certification code begins with "1" or "2." Disc brake shoes do not have identification markings. Drum brake shoes manufactured by GM have contained the marks of "Delco Moraine" or "DM" or a logo that depicts the outline of two brake shoes. Drum brake shoes with these markings may be relined by various manufacturers with non-GM linings. Before 1974, some