

- (f) The date each of the products was removed from the market and no longer sold or distributed and the reason or reasons therefor.
- (g) The date asbestos was removed from such products, if ever, and the reasons therefor.
- (h) A description of the physical appearance of each of the named products.
- (i) A detailed description of the intended uses of the named products.
- (j) Identify the last year that you sold each asbestos-containing product.

ANSWER:

Defendant objects to Interrogatory No. 6 because it is argumentative, multifarious, harassing and oppressive and seeks to impose an undue burden upon Defendant. It calls for information which is immaterial and irrelevant to any issue in this lawsuit and it is not reasonably calculated to lead to the discovery of admissible evidence. Further, the interrogatory attempts to invade the trade secrets privilege by requesting proprietary and confidential information regarding specific GM products. Subject to and without waiving the foregoing objections, Defendant answers as follows:

As to drum brake linings:

- (a) GM began the manufacture of molded drum brake linings containing chrysotile asbestos in 1939 and began use and sale of them in the 1920s.
- (b) See response to (a). Outside suppliers of drum and disc brake linings were Johns-Manville, Abex Corporation, Eaton Brake Division, Dana Axle, American Coleman, Delco moraine, Inland/Inlite, B.F. Goodrich, Bendix, Dayton Walther, H.K. Porter, Kelsey Hayes, Kelsey Products Division, Rockwell International, Unibond Brake, Wagner Electric, Raybestos Manhattan, Friction Division Products, Ferodo, ITT AMCO, Multibestos, Universal Friction, Akebono, AMCO and Marshall Eclipse.
- (c) Trade Names: United Motors (1918-1961); United Delco (1961-1974); AC-Delco (1974-present); Delco Moraine (1942-present); GM Parts (Unknown date before 1969-present); Goodwrench (1985); Buick*; Cadillac*; Chevrolet*; GMC Truck*; Oldsmobile*; or Pontiac*. Dates