

more information because this interrogatory is vague, ambiguous, broad, burdensome, and unlikely to lead to admissible evidence.

INTERROGATORY NO. 25:

As to the disease asbestosis, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.
- B. How Defendant became aware of the existence of the disease.
- C. Who within the company first discovered, recognized or understood the adverse consequences or effects of the disease and/or of asbestos exposure.
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form.
- F. Who is the custodian of such information.
- G. The date on which you first received knowledge or information that asbestosis was caused by inhalation of asbestos fibers.

RESPONSE:

Asbestosis is related to exposure to asbestos by definition. Asbestosis can result from prolonged, excessive exposure to respirable asbestos fibers. GM does not know the precise date or manner someone at GM first learned this, but it was no later than 1940. GM cannot determine when any of its hundreds of thousands of current or past employees first heard of these "consequences or effects." To the best of GM's knowledge, however, there is no recognized, scientific substantiation that brake linings create an increased risk of illness to consumers or people who do repairs. GM objects to the rest of this interrogatory because it