

irrelevant to the subject matter of this case, would not be reasonably calculated to lead to the discovery of admissible evidence, and would be burdensome and oppressive. In addition, General Motors Corporation objects to answering this Interrogatory to the extent that it seeks documents and/or other information protected by the attorney work product or attorney-client privilege.

ANSWERS TO INTERROGATORIES

1. State the name, address, job title, length of time employed by Defendant, and a year-by-year list of all other positions, titles, or jobs held when working for Defendant of each person who has supplied any information used in answering these interrogatories.

ANSWER:

Defendant objects to Interrogatory No. 1 because it requires it to list those persons who gave information regarding these interrogatories since such information is irrelevant and immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Further, Plaintiff seeks through this interrogatory the same information sought in various other interrogatories, specifically Interrogatory No. 61, and, therefore, this interrogatory is duplicitous and seeks to harass and oppress as well as impose an undue burden upon Defendant. Subject to and without waiving the foregoing objections, these interrogatories were answered by General Motors Corporation, P.O. Box 33122, Detroit, Michigan 48232, with the assistance of its attorneys and were verified by its authorized agent.

2. State whether or not you are a corporation. If so, state your correct corporate name, the state of your incorporation, the address of your principal place of business, the name and address of the person or entity authorized to accept service of process on your behalf, and whether or not you have ever held a Certificate of Authority to do business in the State of Texas.

ANSWER:

General Motors Corporation ("GM") is incorporated in Delaware. Its principal place of business is 3044 West Grand Boulevard, Detroit, Michigan 48202. CT Corporation, 350 North St. Paul Street, Suite 2900, Dallas, Texas 75201, is authorized to accept service of process on behalf of GM in the State of