

"This defendant" has been interpreted to mean General Motors Corporation as it has existed from October 13, 1916 to the present, including any relevant entities doing business in the United States which may have been subsidiaries at one time. These interrogatory responses cover applicable products manufactured and/or distributed by defendant in the United States.

In Interrogatory 9 and subsequent interrogatories, the term "manufacture" has been interpreted to mean the combining of raw asbestos with other materials to produce an item. The term "heavy duty trucks and trailers" has been interpreted to include medium duty trucks. The term "brake shoes, brake blocks, brake pads, brake linings, or brake bands" has been interpreted as referring to wheel brakes.

General Motors objects to these interrogatories as overbroad. Plaintiff claims exposure to asbestos from one product -- brake linings for motor vehicles. Accordingly, General Motors responses are limited to that product.

DEFINITIONS

1. "This Defendant" means "The named defendant herein" and all predecessors in interest, and successors in interest of "The named defendant herein."

2. "You" and "Your" refer to the defendant who is named above as the responding party. If more than one responding party is named, "you" and "your" refer to each responding party separately, not jointly. A separate copy of these questions has been provided for each responding party.

3. "Raw asbestos" means asbestos fiber mined or milled, either packaged or in bulk, not compounded with other substances and essentially pure, with the exception of naturally occurring trace amounts of other substances.

4. A request to "Identify a Product" shall mean a request to describe the product, the material or compound by the following means: (1) by nickname or slang used in your industry or occupation; (2) by the name under which it is sold in the marketplace (tradename); and (3) by its generic name.