

forwarded to the general membership of any organization, association or other entity to which it may have belonged over the years. GM has not collected any such publications it may have received in one place or compiled a list of them. If plaintiff will identify a specific organization, GM will attempt to determine if it was a member. GM objects to this request because it is vague, overly broad, unduly burdensome, and not likely to lead to admissible evidence.

INTERROGATORY NO. 21:

Identify by name and location each plant or manufacturing facility in which the products listed in your answers to Interrogatory Nos. 3-6 were manufactured, assembled, or prepared for sale or marketing, specifying which plants produced each item, the dates each plant is or was in operation, and the time span during which each named item was produced or manufactured.

RESPONSE:

GM combined asbestos fiber and other ingredients to produce asbestos-containing brake linings at plants operated by Inland Division (later Delco Products and Delco Chassis Divisions) in Dayton, Ohio (1939-1964) and Vandalia, Ohio (1962-present). GM combined asbestos fiber and other ingredients to produce asbestos-containing brake linings (1966-85) and extruded band linings for automatic transmissions (1965-79) at plants operated by Delco Moraine Division in Dayton, Ohio.

INTERROGATORY NO. 22:

Have printed sales materials been prepared by Defendant or any of its subsidiary or predecessor companies or their agents for