

- c. GM stopped manufacturing asbestos-containing disc brake linings in 1985.
- d. Not applicable.
- e. Delco Moraine Division, Dayton, Ohio.
- f. See b, c, and e.
- g. The total percentage of all grades of chrysotile asbestos used from 1966 to 1985 was in a range of approximately 30% to 60%.

The precise formulations used in GM disc brake linings are valuable proprietary information. This information is disclosed only within GM on a need-to-know basis. These formulations are the result of decades of investment of time and money. Disclosure of this information would put GM at a serious competitive disadvantage because domestic and foreign competitors could duplicate GM's products without having to undertake the lengthy and expensive laboratory and vehicle testing program that GM has undertaken. Competitors could also use this information to improve their products and processing methods without having to compensate GM for its efforts. This subpart is also overly broad, unduly burdensome, and is unlikely to lead to admissible evidence. Therefore, GM objects.

h. Chrysotile

i. Chrysotile was purchased from:

Asbestos Corp., Ltd.	1967 - 1970
Lake Asbestos	1967 - 1970
C. L. Zimmerman Co. 3655 Central Parkway Cincinnati, Ohio	1972 - 1977
Canadian Johns-Manville Asbestos, Quebec	1967 - 1984
National Gypsum Co. Cleveland, Ohio	1972
Union Insulating Co. Parkersburg, W. Virginia	1976
Chrysler Chemical Division Trenton, Michigan	1978

- j. Disc brake lining segments consisted of a dense, grayish or tan material. Typical dimensions are height of 57-63 millimeters, width of 125-142 millimeters, and thickness of 11-13 millimeters.