

- H. Whether there are any warning labels on said products or containers regarding potential asbestos-related health hazards.

RESPONSE:

The responses to 6 and 14 cover the asbestos-containing friction materials for cars, trucks, and buses manufactured and distributed in the United States by General Motors Corporation and its wholly-owned subsidiaries. GM objects to this interrogatory to the extent it encompasses foreign subsidiaries because it is overly broad, unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 38:

State whether you or any of your predecessors and/or subsidiaries maintain, from 1940 through the present or for any portion thereof, copies of invoices, shipping documents, bills of lading, purchase orders, or other documents of a similar nature relating to the mining, manufacture, marketing, sale or distribution of asbestos products. If so, state:

- A. The location of such documents.
- B. The name and address of the custodian of the documents.
- C. The format in which the documents are kept, i.e., hard copy, microfilm, microfiche, etc.
- D. In what form the documents can be accessed, i.e., by state, by product, etc., and if by product, whether kept according to asbestos or non-asbestos.

RESPONSE:

GM's usual business practice is to maintain records of the sale of replacement automotive parts, including friction parts, for approximately six years. Records of vehicle sales are generally kept for approximately ten years. GM objects to the rest of this interrogatory because it is vague, ambiguous, overly broad, burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence.