

16. If the Answer to the preceding Interrogatory is negative, identify which of your sales personnel were responsible for sales into Pennsylvania from 1930 through the present, during what years, what were their last known employers and addresses, and which are still your employees?

RESPONSE:

See answer to 14.

17. Do any documents, including written memoranda, company specifications, blueprints or other written materials of any kind or character relating to the design, preparations, or chemical composition of the products listed in Answer to Interrogatory No. 14 now exist? If so, please identify each such document.

RESPONSE:

GM drum brake linings contain one or more grades of chrysotile asbestos, generally grades 5, 6 and 7, and the approximate percentage by weight ranged between 50% to 75%. The grade of chrysotile asbestos used in drum brake linings purchased by GM is unknown.

GM disc brake linings contain one or more grades of chrysotile asbestos, generally grades 5, 6 and 7, and the approximate percentage by weight ranged between 30% to 60%. The grade of chrysotile asbestos used in disc brake linings purchased by GM is unknown.

The specific formulations used in the manufacture of brake lining segments and disc pads is valuable, proprietary information that is disclosed only within GM on a need-to-know basis. These formulations are the result of decades of investment of time and money and their disclosure would put GM at a serious competitive disadvantage because domestic and foreign competitors could duplicate GM products without having to undertake the lengthy and expensive laboratory and vehicle testing program undertaken by GM. Competitors could also use this information to improve their products and processing methods without having to compensate GM for its efforts. For these reasons, GM objects to the disclosure of the details of its formulations.

Engineering drawings and other documents exist for at least a part of the sixty or more years that GM has manufactured brake linings. There is no list of these drawings and documents and just compiling a list would be an extensive and extremely burdensome task. Many of the documents are located at the Delco Chassis Division of