

- (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 assessed, i.e., by state, by product, etc., and if by product, whether kept according to asbestos or non-asbestos.

ANSWER:

Defendant objects to Interrogatory No. 38 to the extent it inquires of "predecessor companies" without identifying or defining such. Moreover, the interrogatory calls for a legal conclusion as to what companies are "predecessors" without setting forth a factual or legal foundation for such an opinion. Further, the interrogatory is overly broad, general and global, seeks information which is irrelevant and immaterial to any issue in this lawsuit and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the interrogatory seeks to harass, oppress, and to impose undue burdens upon Defendant in the form of extreme and unnecessary time, expense and manpower. Subject to and without waiving the foregoing objections, GM's usual business practice is to maintain records concerning the sale of replacement automotive parts, including friction parts for approximately six years. Records of vehicle sales are generally kept for approximately ten years.

39. Will you call company representatives as witnesses at the trial of any of these cases? If so, list:
- (a) The name, address, and job title of each company representative who may be called.
 - (b) A summary of the testimony expected to be given by each such witness.
 - (c) List any and all previous times that the named witnesses have either given deposition or trial testimony in an asbestos-related case, including the jurisdiction, style of the case, case number, date of testimony, and the name of the attorney taking the deposition for the Plaintiffs in that case.