

36. Has defendant ever had a department or departments which had responsibility for, or were engaged in, scientific and/or medical research concerning health hazards relative to asbestos exposure from asbestos products? If so, state as to each applicable department:

- (a) the name and address of the department;
- (b) the dates each such department was so involved;
- (c) a detailed description of all activities conducted by each said department;
- (d) the name, address and present job title of the party responsible for such department at any time from 1920 to the present;
- (e) a detailed description of all actions undertaken by defendant as a result of any report or communication received from said department;
- (f) the annual cost of the department;
- (g) the title, author, date and substance of all reports or any other written communications promulgated or drafted in said department, as well as the name, address, and job title of the present custodian of all such reports or communications (or alternatively attach copies of same hereto);
- (h) the substance of all oral reports or communications by said department as well as the name, address, and job title of the parties involved in said report or communication.

ANSWER:

- (a) GM has departments and activities which have, in the routine course of their business operations addressed themselves from time-to-time to questions regarding the potential for excessive exposure to asbestos under a variety of circumstances and conditions. No department has exclusively engaged in or conducted such operations. As used in this Interrogatory, the terms "scientific and/or medical research" and "health hazards" have not been defined. Depending upon the definitions of

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