

clutch facings that were assembled by GM had a "GM" marking on the facing. Current manual transmission clutch facings do not have identification markings.

52. Has your company, or your predecessor(s) or subsidiaries, ever devised a research plan to develop, or actually developed or had developed, a product which did not contain asbestos and which could be substituted for one or more of your asbestos-containing products? If so, state the date that such research plan was begun and when such asbestos-free product was first placed on the market.

ANSWER:

Defendant objects to Interrogatory No. 52 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, global and vague in that it is not limited in time. The interrogatory is unintelligible and seeks information that is neither relevant or material to any issue in this lawsuit and is not reasonably calculated to lead to the discovery of admissible evidence. Finally, GM objects to this interrogatory because it serves only to harass, oppress, and impose undue burdens upon Defendant and seeks information protected by the attorney work product, investigative and third-party communication privileges set forth in Rule 166b of the Texas Rules of Civil Procedure. Subject to and without waiving the foregoing objections, brake linings that did not contain asbestos were used on GM vehicles before the introduction of asbestos-containing linings in the 1920's, and some disc and drum brake linings from 1980 to present, and in special applications, like police cars, at other times.

53. Did your company or its predecessor(s) or subsidiaries ever recall any products containing asbestos from the market or stream of commerce? If so, state:
- (a) All details of such recall;
 - (b) The name of the product recalled, including the reason for the recall and the names and current addresses of those individuals who determined that it should take place;
 - (c) The dates of recall;