

RESPONSE:

In 1975, GM began placing this caution, with language copied from the OSHA regulation, on packages of replacement brakelinings:

"CAUTION: CONTAINS ASBESTOS FIBERS. AVOID CREATING DUST. BREATHING ASBESTOS DUST MAY CAUSE SERIOUS BODILY HARM."

The word "CAUTION" was in no smaller than 12 point type. The rest of the words were in no smaller than 10 point type. GM specified the minimum size. Beginning in 1989, GM changed the caution to:

"Danger: Contains asbestos fibers. Avoid creating dust. Cancer and Lung Disease hazard. Do not grind. Do not clean with compressed air. * See Service Manual Instructions **"

Starting in the 1977 model year, GM included this statement in its service manuals:

"Caution: When servicing wheel brake parts, do not create dust by grinding or sanding brake linings or by cleaning wheel brake parts with a dry brush or with compressed air. (A water dampened cloth should be used.) Many wheel brake parts contain asbestos fibers which can become airborne if dust is created during servicing. Breathing dust containing asbestos fibers may cause serious bodily harm."

29. Please list all the current or past trademarks used by this defendant.

RESPONSE:

See answer to 27(a)-(b), as to drum and disc brake linings. GM objects to this interrogatory because it is overly broad and not reasonably calculated to lead to admissible evidence.

30. What was the date of the first worker's compensation claim filed against this defendant for an asbestos-related disease?