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IN RE: ASBESTOS LITIGATION § IN THE DISTRICT COURTS OF
 § CAMERON COUNTY, T E X A S
 §

**DEFENDANT GENERAL MOTORS CORPORATION'S
RESPONSES TO PLAINTIFFS' MASTER INTERROGATORIES
AND REQUESTS FOR PRODUCTION**

To: Russell W. Budd, Baron & Budd, The Centrum, 3102 Oak Lawn
Avenue, Suite 1100, Dallas, Texas 75219.

General Motors Corporation [GM] makes these Responses to
Plaintiffs' First Set of Interrogatories and Request for Production
of Documents to Defendant.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1:

State the name, address, job title, length of time employed by
Defendant, and a year-by-year list of all other positions, titles,
or jobs held when working for Defendant of each person who has
supplied any information used in answering these interrogatories.

RESPONSE:

These interrogatories were verified in accordance with the
Rules of Civil Procedure by the person signing the verification
form. They were prepared by General Motors with the help of its
lawyers, including Philip R. Cosgrove, Grace, Skocypec, Cosgrove &
Schirm, 5700 Wilshire Boulevard, Suite 300N, Los Angeles,
California 90036, (213) 487-6660.

INTERROGATORY NO. 2:

State whether or not you are a corporation. If so, state your
correct corporate name, the state of your incorporation, the