

- (b) The dates during which Defendant or any of its subsidiaries or predecessors were members.
- (c) The names and dates of any publications, minutes, or reports published, written, or disseminated by any of the named associations or organizations.
- (d) Whether any of those publications are still in your possession, and if so:
 - (i) A description of the publications, including the date.
 - (ii) The current location of such publications.
 - (iii) The custodian of such publications.
 - (iv) The method or manner in which such publications are maintained.

ANSWER:

Defendant objects to Interrogatory No. 20 to the extent it is overly broad, general and global and inquires of "predecessor" companies without defining such. For this reason, the interrogatory also inquires of information which is irrelevant and immaterial and the interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Further, the question calls for a legal conclusion as to the status of a "predecessor" company without setting forth a factual basis or foundation for such an opinion. Moreover, the interrogatory is argumentative and multifarious and is overly broad in that it is not limited in time and not limited to exposure to the asbestos-containing products listed in response to Interrogatory No. 6. Further, the interrogatory seeks to impose an undue burden upon the Defendant. Finally, the interrogatory seeks information which is neither relevant nor material to any issue in this case and is not reasonably calculated to lead to the discovery of admissible evidence at the trial of this lawsuit. Subject to and without waiving the foregoing objections, Defendant has been a member of numerous organizations from 1930 to present. GM has not collected or maintained publications it may have received from the organizations. If Plaintiff will more particularly identify an organization, GM will attempt to determine if it was or is a member.

21. Identify by name and location each plant or manufacturing facility in which the products listed in your answers to Interrogatory Nos. 3-6 were manufactured,