

20. All documents and depositions containing information about worker's compensation claims or suits by employees of DEFENDANT where there was a claim that the injury was due to asbestos exposure.

RESPONSE: GM's records of workers' compensation claims are maintained at various divisional and plant offices. Because those records are not all indexed by the nature of the claim, a manual search of the files would be required in order to respond to this Request. Defendant will make the portion of those records that are not privileged or attorney work product available for inspection where they are maintained in the ordinary course of business.

21. All correspondence between DEFENDANT and its worker's compensation agents or insurers that refer to changes in rates due to asbestos exposure for the period in which DEFENDANT's products containing asbestos were sold, used, supplied or installed.

RESPONSE: GM has not located any such documents.

22. All Securities and Exchange Commission filings that refer to asbestos litigation against DEFENDANT, its predecessor(s) or subsidiaries.

RESPONSE: GM has not made filings with the SEC regarding asbestos litigation.

23. For each of the past five years, an annual report of DEFENDANT or a balance sheet that reflects Defendant's corporate worth and financial status.

RESPONSE: GM will make a copy of its most recent annual report available for inspection.

24. Any and all documents referred to in defendant's answers to Plaintiff's interrogatories.

RESPONSE: The documents referred to will be made available for inspection.

25. Any and all patents issued or assigned to DEFENDANT for asbestos-containing products.

RESPONSE: Patents are public records and are available to plaintiff. GM objects to this Request because it is vague, overly broad, and unduly burdensome and it asks for information that is neither relevant nor likely to lead to admissible evidence.

26. An exemplar of each type of the asbestos-containing brake linings used by DEFENDANT in automobiles and trucks manufactured for sale in the United States during the 1950s and 1960s.