

(h) GM does not know what "entity listed" means in this interrogatory.

(i) GM does not know what is meant by "entity in question" in this interrogatory.

(k) 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 drum brake linings from about the 1980s to present, and in special applications, like police cars, at other times.

As to disc brake linings manufactured by GM:

(a)-(b) Delco, GM Parts, Goodwrench, GM & AMC.

(c)-(d) GM disc brake linings contain one or more grades of chrysotile asbestos, generally grades 5, 6 and 7, and the approximate percentage by weight ranged between 30% to 60%.

(e) GM.

(f) GM objects to this interrogatory because it is overly broad and not reasonably calculated to lead to admissible evidence.

(g) Disc brake lining segments consisted of a dense, grayish or tan material. Typical dimensions are height of 57-63 millimeters, width of 125-142 millimeters, and thickness of 11-13 millimeters. GM's recommendations for maintaining and servicing brake linings are contained in numerous service manuals. GM will provide excerpts from a typical service manual about disc brake lining installation.

(h) GM does not know what "entity listed" means in this interrogatory.

(i) GM does not know what is meant by "entity in question" in this interrogatory.

(k) Some disc brake linings that did not contain asbestos were used from the 1980s to present.

See response to No. 20.

28. If this defendant ever placed warning labels on any asbestoscontaining product stating that inhalation of asbestos fibers could be harmful, please identify each product, the date such labels were first placed on the product, the language of the label, the size and color of the label and attach a photocopy of the label.