RESPONSE:

GM's usual business practice is to maintain records concerning the sale of replacement automotive parts, including friction parts, for approximately six years. Records of vehicle sales are generally kept for approximately ten years. Most, if not all, records of purchases for the relevant time periods are no longer available because of normal record retention policies. GM has different record retention policies for many different types of documents at many different locations. General Motors objects to this interrogatory because it is overly broad, unduly burdensome, and will not lead to admissible evidence.

INTERROGATORY NO. 39:

Will you call company representatives as witnesses at the trial of any of these cases? If so, list:

(a) The name, address, and job title of each company representative who may be called.

(b) A summary of the testimony expected to be given by each such witness.

(c) List any and all previous times that the named witnesses have either given deposition or trial testimony in an asbestos-related case, including the jurisdiction, style of the case, case number, date of testimony, and the name of the attorney taking the deposition for the Plaintiffs in that case.

RESPONSE:

Discovery and investigation by General Motors are continuing. General Motors and its lawyers have not yet determined what witnesses, evidence or exhibits General Motors may use at trial. General Motors also objects to this interrogatory because it asks