

PLAINTIFFS' EXHIBITS  
GENERAL MOTORS CORPORATION

| EXHIBIT<br>NUMBER | DESCRIPTION                                                                                                                                                                                                                                |
|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| GM- 1             | Letter dated February 12, 1932 from A. J. Lanza to Dr. F. V. Meriwether.                                                                                                                                                                   |
| GM- 2             | Letter dated February 15, 1932 from F. V. Meriwether to Dr. A. J. Lanza.                                                                                                                                                                   |
| GM- 3             | Letter dated February 20, 1932 from R. R. Sayers to The Surgeon General with attached letter dated February 12, 1932 from A. J. Lanza to Dr. F. V. Meriwether and letter dated February 15, 1932 from F. V. Meriwether to Dr. A. J. Lanza. |
| GM- 4             | Article entitled, "Recognition and Control of Fume and Dust Exposure," by V. J. Castrop, published in National Safety News, February, 1948.                                                                                                |
| GM- 5             | Minutes of the Meeting of the Friction Materials Standards Institute, Inc., June 27-28, 1973.                                                                                                                                              |
| GM- 6             | Response of Defendant General Motors Corporation to Plaintiffs' First Interrogatories, Glore v. Raybestos Manhattan, Inc., et al in the USDC, Southern District of Georgia, Augusta Division, December 10, 1981.                           |
| GM- 7             | Deposition of Daniel R. Stocker taken in Vaughn, et al v. Raymark Industries, Inc., et al USDC, Eastern District of Missouri, Eastern Division, December 8, 1983.                                                                          |
| GM- 8             | Plaintiffs' First Interrogatories, Requests for Production of Documents and Requests for Admission and Responses Thereto, Horn v. The Bendix Corp., et al King County Superior Court, Washington, January 13, 1984.                        |
| GM- 9             | EPA fact sheet titled "Controlling Brake Dust to Protect Your Health ...What Every Auto Mechanic Should Know", EPA-560, OPTS-86-003, September, 1986.                                                                                      |
| GM- 10            | EPA booklet titled "Guidance for Preventing Asbestos Disease Among Auto Mechanics", EPA-560-OPTS-86-002, June, 1986.                                                                                                                       |

General Motor

| EXHIBIT<br>NUMBER | DESCRIPTION                                                                                                                                                                                                                                                                 |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| GM- 11            | Article, "Asbestos Brake Emissions" by R. L. Williams and J. L. Muhlbaier, Environmental Science Department, General Motors Research Laboratories, Environmental Research, 29, 70-82 (1982).                                                                                |
| GM- 12            | SAE Technical Paper Series, 811036, Simulation of Automobile Brake Wear Dynamics and Estimation of Emissions, by S. Cha, P. Carter and R. L. Bradow, Passenger Car Meeting, Dearborn, Michigan, June 6-9, 1983.                                                             |
| GM- 13            | Defendant General Motors Corporation's Answers to Plaintiffs' Interrogatories, Boatner v. General Motors, State of Michigan, Circuit Court for the County of Wayne, February 20, 1986.                                                                                      |
| GM- 14            | Amended and Supplemented Responses of General Motors Corporation to "Plaintiffs' Standard Interrogatories to Friction Defendants", Egan v. Raybestos-Manhattan, Inc., et al., Superior Court of California in and for the City and County of San Francisco, August 5, 1986. |
| GM- 15            | Response of General Motors Corporation to Plaintiffs' First Set of Interrogatories, Gonsalves v. Fibreboard Corporation, et al., Superior Court, County of Alameda, January 8, 1987.                                                                                        |
| GM- 16            | Air Sampling & Industrial Hygiene Survey of Genuine Parts Company, Rayloc Division dated August, 1972 conducted by John Dement and Patrick Shuler (NIOSH-sponsored)                                                                                                         |
| GM- 17            | General Motors Corporation's Responses To Plaintiffs' Interrogatories Set I, DiSantis v. Abex Corporation, et al., including General Motors Corporation, In the United States District Court for the Eastern District of Pennsylvania, dated 1/5/88                         |
| GM- 18            | Defendant's General Motors Corporation, Supplemental Responses to Plaintiffs' Interrogatories Set I, DiSantis v. Abex Corporation et al., including General Motors Corporation, Civil Action No. 87-0515 (no date)                                                          |

| EXHIBIT<br>NUMBER | DESCRIPTION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| GM- 92            | Document entitled: FOUNDATION FACTS - a monthly newsletter issued to industrial concerns holding membership in Industrial Hygiene Foundation - dated August, 1949 - M.E. Coyle of General Motors to Keynote Annual Meeting Conferences to Include one on Air and Stream Pollution; (additional excerpts).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| GM- 93            | Title page - TRANSACTIONS, MEDICAL AND ENGINEERING SECTION - Tenth Annual Meeting - Transactions Series, Bulletin No. 6, published in 1946, By: C.O. Sappington, M.D. Dr. P.H., Industrial Health Consultant - T. Lyle Hazlett, M.D., Medical Director, Westinghouse Electric Corporation; Leroy U. Gardner, M.D., Director, The Saranac Laboratory; A.G. Cranch, M.D., Industrial Toxicology Department, Union Carbide and Carbon Corporation; L.E. Hamlin, M.D., Medical Director, American Brake Shoe Company; O.A. Sander, M.D., Member, Foundation's Medical Committee; Francis R. Holden, Ph.D., W.C.L. Hemeon, M.S., E.C. Hyatt, Industrial Hygiene Foundation; W. M. Gafafer, D.Sc., Chief, Statistical Unit, Industrial Hygiene Division, Bureau of State Services, U.S. Public Health Service. |
| GM- 94            | Defendant's General Motors Corporation Responses to Plaintiffs' Master Request for Production; In Re: Asbestos Litigation; District Court of Bexar County, Texas, 285th Judicial District; dated November 30, 1995.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| GM- 95            | Defendant General Motors Corporation's Response to Plaintiff's Interrogatories; Lawrence Gonsalves and Villa Gonsalves vs. Fibreboard Corporation, et al; Superior Court of California; January 5, 1987.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| GM- 96            | Amended and Supplemented Responses of General Motors Corporation to "Plaintiff's Standard Interrogatories to Friction Defendants; Renee Egan, Kathleen Lee Davey and George Michael Egan vs. Raybestos-Manhattan, Inc.; Superior Court State of California in and for the City and County of San Francisco; August 10, 1986.                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| GM- 97            | General Motors Corporation's Responses to Plaintiffs' First Set of Interrogatories served March 14, 1997, filed in District Court of Brazoria County in the matter of Carolyn Bouldin, Individually of and as Executrix of the Estate of Weldon T. Bouldin, Deceased, Elizabeth Bouldin and Gladys Bouldin v. ABEX Corporation, et al.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| GM- 98            | 1953 Inlite Catalog Friction Material for Passenger Cars and Light Trucks; Bulletin 24A-100, 07/01/1953; A General Motors Product, A United Motors Line.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

General Motor

| EXHIBIT<br>NUMBER | DESCRIPTION                                                                                                                                                                                                                                                                                                                                         |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| GM- 99a           | Customer Contact Report, Union Carbide Corp., Calidria Asbestos, R.E. Byrne and T.P. Norris to G.M. Employee Paul Sandoz re: provision of SG-210 sample, dated August 6, 1971.                                                                                                                                                                      |
| GM- 99b           | Customer Contact Report, Union Carbide Corp., Calidria Asbestos, T.P. Norris to General Motors employees Jim Miller (Engineering Dept., Brake Lining - Dayton, Ohio) and Dr. Bill Krebs (Research Administrator - Warren, Michigan) re: tracking source of GM's rumored ban on asbestos, dated January 4, 1973.                                     |
| GM- 99c           | Customer Contact Report, Union Carbide Corp., Calidria Asbestos, T.P. Norris to General Motors employee Harold Beckerleg re: lead solder replacement applications of RG-144, dated June 21, 1973.                                                                                                                                                   |
| GM- 99d           | Customer Contact Report, Union Carbide Corp., Calidria Asbestos, H.B. Rhodes to General Motors employee Dr. W.H. Krebs re: reports of GM's ban on asbestos-containing products which were cut or abraded, dated August 10, 1973.                                                                                                                    |
| GM- 99e           | Customer Contact Report, Union Carbide Corp., Calidria Asbestos, J.L. Myers, W.C. Thurber, and T.P. Norris to General Motors employees Walt Kohn (Industrial Hygiene Staff), Dr. Bill Krebs (Industrial Hygiene Staff), and Vincent Castrop (Director of Industrial Hygiene) re: clarification of GM's alleged asbestos ban, dated August 10, 1973. |
| GM- 99f           | Customer Contact Report, Union Carbide Corp., Calidria Asbestos, T.P. Norris to File, re: update of GM's asbestos problems, dated August 14, 1973.                                                                                                                                                                                                  |
| GM- 99g           | Customer Contact Report, Union Carbide Corp., Calidria Asbestos, H.B. Rhodes to General Motors employee Dr. W. Krebs, re: analysis of recent fiber counts, dated March 20, 1975.                                                                                                                                                                    |
| GM- 99h           | Customer Contact Report, Union Carbide Corp., Calidria Asbestos, H.B. Rhodes to General Motors employee Dr. William Krebs, (Manager Toxic Materials Control) and Mrs. Margo Parker (Corporate Governmental Relations) re: attempts to rescind Fisher Body's ban on testing new asbestos-containing products, dated October 20, 1977.                |
| GM- 99i           | Customer Contact Report, Union Carbide Corp., Calidria Asbestos, Edward J. Kleber to General Motors employee Henry Johnson re: determining Fisher Body's policy regarding asbestos, dated September 19, 1979.                                                                                                                                       |

General Motor

| EXHIBIT<br>NUMBER | DESCRIPTION                                                                                                                                                                                                                                                           |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| GM- 99j           | Customer Contact Report, Union Carbide Corp., Calidria Asbestos, Edward J. Kleber and J.L. Myers to General Motors employees Jim Collins (Dept. Head) and Ted Lasko (Collins' Asst.) re: determining Fisher Body's policy regarding asbestos, February 15, 1979.      |
| GM- 99k           | Customer Contact Report, Union Carbide Corp., Calidria Asbestos, Edward J. Kleber to General Motors employees Ed Miller (Asst. Head, Metallurgy) and Tom Flaim (Ceramicist) re: determination of Calidria status in GM's friction products program, January 15, 1979. |

General Motor

| EXHIBIT<br>NUMBER | DESCRIPTION                                                                                                                                                                                                                                                                                                          |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| GM- 19            | General Motors Corporation's Responses to Plaintiff's Interrogatories to Defendant General Motors, Marcinowski v. General Motors Corporation, et al., In the United States District Court Eastern District of Pennsylvania, Civil Action No. 88-7410 (not dated)                                                     |
| GM- 20            | Defendant's, General Motors Corporation, Responses To Plaintiff's Request For Production, Marcinowski v. Abex Corporation, et al., In the United States District Court for the Eastern District of Pennsylvania, Civil Action No. 88-7410 (undated)                                                                  |
| GM- 21            | Defendant's, General Motors Corporation, Responses To Plaintiff's Request for Production Served May 14, 1991, Marcinowski v. Abex Corporation, et al., In the United States District Court for the Eastern District of Pennsylvania, dated May 14, 1991                                                              |
| GM- 22            | General Motors Corporation's Responses To Plaintiff's Supplemental Interrogatories to Defendant (GM), Marcinowski v. General Motors Corporation et al., In the United States District Court for the Eastern District of Pennsylvania, Civil Action No. 88-7410                                                       |
| GM- 23            | Letter dated April 18, 1979 from John C. Heavey to Milton Gurny.                                                                                                                                                                                                                                                     |
| GM- 24            | McIntyre research Foundation, Registration List- 10th Annual Conference on Silicosis and Other Industrial Pulmonary Diseases Held Jan. 25th, 26th and 27th, 1960. Several GM Canada representatives attended (Bates no. F 00000001654)                                                                               |
| GM- 25            | McIntyre Research Foundation Conference on Silicosis and other Industrial Pulmonary Diseases Programme dated Jan. 25th, 26th and 27th, 1960. GM Ventilation Engineer K.E. Robinson delivers a presentation entitled "A Practical Method of Providing a Suitable In-Plant Environment." (Bates nos. F 00000001667-73) |
| GM- 26            | Handwritten notes (author unknown) of Ken Robinson's (GM Ventilation Engineer) presentation entitled "A Practical Method of Providing a Suitable In-Plant Environment." (dated January 25, 1960)                                                                                                                     |

General Motor

| EXHIBIT<br>NUMBER | DESCRIPTION                                                                                                                                                                                                                                                                                          |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| GM- 27            | Pennsylvania Department of Health, Division of Occupational Health Journal or Report entitled "News & Views," discussing asbestosis among workers at a plant which made brake linings, clutch facings and asbestos textiles. Dated Fall 1965 (Bates nos. F 00000004861-66)                           |
| GM- 28            | National Safety News (Published by the National Safety Council) Article entitled "Fume and Dust Exposures" by V.J. Castrop (Assistant Head, Industrial Hygiene Department, Research Laboratories Division, GM) dated February 1948.                                                                  |
| GM- 29            | Defendant's, General Motors Corporation, Supplemental Responses To Plaintiffs' Interrogatories Set II, DiSantis v. Abex Corporation, et al., including, General Motors Corporation, In the United States District Court for the Eastern District of Pennsylvania, Civil Action No. 87-0515 (undated) |
| GM- 30            | List of participants in the Seventh Saranac Symposium, which included GM officials, as provided by Arthur J. Vorwald's archives (list dated 1952)                                                                                                                                                    |
| GM- 31            | Defendant General Motors Corporation's Answers to Middlesex County Form B Interrogatories, Coates v. Raymark Industries, Inc., et als., Superior Court of New Jersey Law Division, Middlesex County New Jersey, January 20, 1987                                                                     |
| GM- 32            | Second Supplemental response of Defendant General Motors corporation to Plaintiffs' Standard Interrogatories to Defendant, In Re: Complex Asbestos Litigation, Superior Court of the State of California, County of Solano, February 7, 1991                                                         |
| GM- 33            | Responses and/or Objections Filed by Delco A Division of General Motors Corportion to Plaintiff's Interrogatories, Cormick v. Raymark, Inc. Et AL, United States District Court Eastern District of Louisiana, August 20, 1986                                                                       |
| GM- 34            | Defendant General Motors Corporation's Responses to Plaintiffs' Master Interrogatories and Request for Production, In Re: Asbestos Litigation, In the District Courts of Cameron County TX, January 23, 1996                                                                                         |

General Motor

| EXHIBIT<br>NUMBER | DESCRIPTION                                                                                                                                                                                                            |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| GM- 35            | Defendant General Motors Corporation's Responses to Requests for Production, In Re: All Asbestos-Related Personal Injury, In the District Court of Dallas County, TX, March 17, 1995                                   |
| GM- 36            | Defendant's, General Motors Corportation, Responses to Plaintiffs' Master Request for Production, In Re: Asbestos Litigation, In the District Court Bexar County, TX, November 28, 1995                                |
| GM- 37            | Letter dated November 5, 1958 from J.V. Skendall, GM Safety Director, to Frank A. Patty, GM Personnel Staff, requesting a copy of an "APHA" symposium entitled "Status of the Pneumoconioses"                          |
| GM- 38            | Plaintiffs' Interrogatories To Defendant General Motors Corporation, Caires v. Johns-Manville Corp. et al., In the Superior court of the State of California in and for the County of Alamada, No. 537 868-7 (undated) |
| GM- 39            | Publications Covered in Industrial Hygiene Digest; Industrial Hygiene Foundation April 1944                                                                                                                            |
| GM- 40            | "Report of Preliminary Dust Investigation for Asbestos Textile Institute"; by W. C. L. Hemeon, Head Engineer; Industrial Hygiene Foundation of America; June 1947                                                      |
| GM- 41            | INDUSTRIAL HYGIENE DIGEST, Literature Abstracts, Vol. 13, No. 8, Page 15, August, 1949                                                                                                                                 |
| GM- 42            | INDUSTRIAL HYGIENE DIGEST, Literature Abstracts, Vol. 16, No. 9, Page 29, September, 1952                                                                                                                              |
| GM- 43            | Lists of persons who were invited and who participated in the Seventh Saranac Symposium, September, 1952                                                                                                               |
| GM- 44            | IHF Digest References Regarding Asbestos Disease                                                                                                                                                                       |
| GM- 45            | Report on FMSI Asbestos Study Committee Activities by I. H. Weaver (July 1971 - June 12, 1972).                                                                                                                        |
| GM- 46            | FMSI, Inc., Bulletin No. 478 dated June 14, 1973 from E. W. Drislane; subject: Asbestos Study Committee Activities, with attachments.                                                                                  |

General Motor

| EXHIBIT<br>NUMBER | DESCRIPTION                                                                                                                                                                                                                                                  |
|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| GM- 47            | Minutes of the Annual Meeting of the Friction Materials Standards Institute, Inc., June 27 and 28, 1973.                                                                                                                                                     |
| GM- 48            | Report titled "Asbestos and the Friction Material Industry". I. H. Weaver's address of June 27, 1973.                                                                                                                                                        |
| GM- 49            | FMSI Seminar on Asbestos, December 3 and 4, 1975.                                                                                                                                                                                                            |
| GM- 50            | List: 1.3 - Active Members (Cont.d), August 1981.                                                                                                                                                                                                            |
| GM- 51            | Confidential Minutes of Meeting on Asbestos and Health, General Motors Corporation, Inland Manufacturing Division, January 28, 1969 by E. M Fenner, dated February 4, 1969.                                                                                  |
| GM- 52            | Research & Engineering Memo For File dated September 8, 1970 from S. Speil; re: Visit to Inland Division of General Motors - August 31, 1970, Brake Lining Decomposition Products.                                                                           |
| GM- 53            | Arthur D. Little, Inc. report "U.S. Manufacturers of Asbestos-Bearing Friction Materials; Estimates of Distribution of 1973 Sales of Asbestos Friction Materials by the Major Manufacturing Companies, Active Members and Regional Members", September 1975. |
| GM- 54            | Minutes of the Annual Meeting of the Friction Materials Standards Institute, Inc., June 28 & 29, 1972.                                                                                                                                                       |
| GM- 55            | FMSI, Inc., Bulletin No. 471 from E. W. Drislane, dated March 9, 1973 to Delegates and Alternates; subject: Recommendations of the Asbestos Study Committee (pages 1, 2 and Labeling Survey).                                                                |
| GM- 56            | Minutes of the annual meeting of the Friction Materials Standards Institute, Inc., June 28-29, 1978.                                                                                                                                                         |
| GM- 57            | Minutes of the annual meeting of the Friction Materials Standards Institute, Inc., June 17-18, 1981.                                                                                                                                                         |
| GM- 58            | Chevrolet Motors Division, General Motors Corporation letter dated May 18, 1977 from R. G. Perry to E. M. Doyle. (Bates No. RBS 2558)                                                                                                                        |

General Motor

| EXHIBIT<br>NUMBER | DESCRIPTION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| GM- 59            | Industrial Hygiene Department, General Motors Corporation letter dated September 28, 1976 from W. H. Krebs, Ph.D. to W. McCrocklin, Circle Buick.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| GM- 60            | Letter dated September 28, 1976 from W. H. Krebs, Ph.D. to T. Ploucha, Circle Buick-East; re: Industrial Hygiene Survey of Circle Buick-East, New York City.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| GM- 61            | Letter dated September 28, 1976 from W. H. Krebs, Ph.D. to W. O'Neil, Pontiac Motor Division; subject: Industrial Hygiene Survey of West Side Pontiac, New York City.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| GM- 62            | General Motors Corporation memo dated June 29, 1972 from George B. Morris, Jr. to General Managers, Personnel Directors, Staff Executives; subject: Standard for Exposure to Asbestos Dust.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| GM- 63            | Articles from The Annals of Occupational Hygiene, Vol. 13, 1970: D. E. Hickish - Exposure to asbestos during brake and clutch maintenance; W. J. Smither - Asbestos and asbestosis; S. A. Roach - Hygiene standards for asbestos; D. E. Hickish and K. L. Knight - Exposure to asbestos during brake maintenance; S. Luxon - Technical implementation of the new asbestos regulations; D. Hatch - Possible alternatives to asbestos as a friction material; M. L. Bentley - Control of the use of asbestos-containing friction materials; G. L. Lee - Removing dust from brake assemblies during vehicle servicing--alternative cleaning methods; K. L. Knight and D. E. Hickish - Investigations into alternative forms of control for dust generated during the cleaning of brake assemblies and drums; and S. Luxon - Respirators for protection against asbestos. |
| GM- 64            | Documents: Appendix A - Mineral Fiber Research Institute Lists; Appendix B - Basic Qualifications of an Executive Director, December 1, 1966; Appendix C - Suggested letter - 12/1/66; Appendix D - Memorandum dated November 22, 1966 from Carl Thompson to F. J. Solon, Jr., subj: Estimates for Asbestos-Health Library and Literature Search.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| GM- 65            | "Asbestos Workers" from Potential Exposures in Industry, Industrial Hygiene and Toxicology, Second Revised Edition, Frank A. Patty, Editor, Volume II Toxicology. 1963.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

| EXHIBIT<br>NUMBER | DESCRIPTION                                                                                                                                                                                                                                                         |
|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| GM- 66            | Article "Pleural mesothelioma in a brake mechanic" by M. Huncharek, J. Muscat and J V. Capotorto; British Journal of Industrial Medicine 1989:46 69-71.                                                                                                             |
| GM- 67            | Article "Asbestos Exposure of Brake Repair Workers in the United States" by W. V. Lorimer, A. N. Rohl, A. Miller, W. J. Nicholson and I. J. Selikoff; The Mount Sinai Journal of Medicine, Vol. 43, No. 3, May-June 1976.                                           |
| GM- 68            | NEWHOUSE, M., BERRY, G., SKIDMORE, J. A Mortality Study of Workers Manufacturing Friction Materials with Chrysotile Asbestos. Annals of Occupational Hygiene, 20(1-4):899-909. 1982.                                                                                |
| GM- 69            | ROBINSON, C; LEMEN, R; WAGONER, J; "MORTALITY PATTERNS, '40--'75 AMONG WORKERS EMPLOYED IN AN ASBESTOS TEXTILE FRICTION AND PACKING PRODUCTS MANUFACTURING FACILITY." FROM DUSTS & DISEASE 1979.                                                                    |
| GM- 70            | Article "Asbestos Exposure during Brake Lining Maintenance and Repair" by A. N. Rohl, A. M. Langer, M. S. Wolfe and I. Weisman; Environmental Research 12; 110-128 (1976)                                                                                           |
| GM- 71            | HUNCHAREK, M., MUSCAT, J., CAPOTORTO, J. Pleural Mesothelioma in a Lift Mechanic. British Journal of Industrial Medicine, 46:500-501. 1989.                                                                                                                         |
| GM- 72            | NIOSH Current Intelligence Bulletin, Reprints - Bulletins 1 thru 18, including Current Intelligence Bulletin 5, August 8, 1975, Asbestos, Asbestos Exposure During Servicing of Motor Vehicle Brake and Clutch Assemblies.                                          |
| GM- 73            | Index, Industrial Hygiene Digest 1942; Industrial Hygiene Foundation; January 1943                                                                                                                                                                                  |
| GM- 74            | "Industrial Hygiene Digest"; Industrial Hygiene Foundation, September, 1942                                                                                                                                                                                         |
| GM- 75            | Memorandum dated August 21, 1973 from W. M. Spurgeon to Distribution; subject: Presentation and Correspondence on Asbestos; transmitting: FMSI August 14, 1973 memo and Dr. Irving Selikoff Presentation to American Industrial Hygiene Conference of May 21, 1973. |

| EXHIBIT<br>NUMBER | DESCRIPTION                                                                                                                                                                                                                                                                                              |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| GM- 76            | Letter dated February 14, 1963 from John V. Skendall, Safety Director to Industrial Hygiene Foundation.                                                                                                                                                                                                  |
| GM- 77            | Industrial Hygiene Foundation of America, Legal Series Bulletin No. 4, "Current Status of Compensation for Pneumoconioses", 1963                                                                                                                                                                         |
| GM- 78            | "Industrial Hygiene Digest"; Industrial Hygiene Foundation, May 1943                                                                                                                                                                                                                                     |
| GM- 79a           | General Motors Corporation Statement on EPA Proposed Asbestos Mining and Import Restrictions and Manufacturing, Importation and Processing Prohibitions July 16, 1986; by Willlliam H. Krebs.                                                                                                            |
| GM- 79b           | General Motors Corporation Statement on EPA Proposed Asbestos Mining and Import Restrictions and Manufacturing, Importation and Processing Prohibitions July 16, 1986; by Robert L. LaFevre.                                                                                                             |
| GM- 79c           | General Motors Corporation Statement on EPA Proposed Asbestos Mining and Import Restrictions and Manufacturing, Importation and Processing Prohibitions July 16, 1986; by Thomas M. Johnson.                                                                                                             |
| GM- 79d           | General Motors Corporation Statement on EPA Proposed Asbestos Mining and Import Restrictions and Manufacturing, Importation and Processing Prohibitions July 16, 1986; Closing Remarks by Joseph P. Chu.                                                                                                 |
| GM- 79e           | Transcript of questioning of panel, pages 336-388. Acme Reporting Company.                                                                                                                                                                                                                               |
| GM- 80            | Memo dated February 13, 1969 from E. M. Fenner to W. L. VanDerbeek, et al; subject: Inland Manufacturing Division, General Motors Corporation, Meeting at St. Luke's Hospital - January 28, 1969; transmitting attachment: General Motors letter dated February 11, 1969 from J. F. Hale to E. M. Fenner |
| GM- 81            | Carpenter, Bennet & Morrissey letter dated April 18, 1979 from John C. Heavey to Milton Gurny; subject: Friedman v. General Motors, et al., Zitis v. General Motors, et al.                                                                                                                              |

| EXHIBIT<br>NUMBER | DESCRIPTION                                                                                                                                                                                                                                                                                                                                                                |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| GM- 82            | General Motors Corporation memo dated February 21, 1972 from Directors of Purchasing to Sales Manager; subject: General Quality Standard for Purchased Material, Revised January, 1972; with attachment.                                                                                                                                                                   |
| GM- 83            | Defendant General Motors Corporation's Responses and Objections to Plaintiffs' Master Interrogatories and Requests for Production; In re: All Asbestos-Related Personal Injury or Death Cases Filed by Baron & Budd, P.C. or to be Filed by Baron & Budd, P.C. in El Paso County, Texas; District Courts and County Courts at Law of El Paso, County, Texas; July 8, 1996. |
| GM- 84            | Pages from August 1949 "Asbestos" magazine, pg 5, 8, 7, 10, 9, 12, 11. Article regarding brake linings and various ads.                                                                                                                                                                                                                                                    |
| GM- 85            | Article titled "Brake Linings of Various Types and Their Manufacture", Asbestos magazine, October 1949.                                                                                                                                                                                                                                                                    |
| GM- 86            | Draft of report titled "Recommended Work Practices for Handling Asbestos-Containing Friction Materials", dated March 13, 1978.                                                                                                                                                                                                                                             |
| GM- 87            | Article titled "Mesothelioma Among Car Mechanics?" by H. W. Weitowitz and K. Rodelsperger, Am Occup Hyg, Vol. 38, No. 4, pp. 635-638, 1994; with attached calculation table.                                                                                                                                                                                               |
| GM- 88            | Videotape titled "Don't Blow It", Asbestos Action Program, Department of Transportation, State Highway Administration. (16 min - no audio)                                                                                                                                                                                                                                 |
| GM- 89            | Johns-Manville letter dated November 29, 1977 from James F. Reis to Edward Drislane.                                                                                                                                                                                                                                                                                       |
| GM- 90            | Letter dated February 2, 1972 from H. J. Roesch to M.J. Cowan, DHQ 91, Chevrolet Contract #CO-16154 dated September 23, 1971 for period July 1, 1971 thru June 30, 1972, re: Chevrolet GMAD Assembly Division, w/attached contract                                                                                                                                         |
| GM- 91            | Article entitled: AC-DELCO PRODUCT FACTS - Bulletin No. 4-3A, p.; Issued: 1-15-76; DRUM BRAKE SHOE AND LINING SETS/DISC PADS.                                                                                                                                                                                                                                              |