47. State if defendant has ever become aware at any time of any health hazards relative to asbestos exposure associated with any asbestos product of defendant. If so, state:

(a) the date defendant was first so aware;

(b) the means by which defendant gained such awareness and the name and address of the person who gained such awareness on defendant's part;

(c) a description of what was the substance of the information by which defendant gained such awareness;

(d) what action, if any, defendant took as a result of such awareness;

(e) the title, author, identification number, date, and substance of any and all communications regarding such awareness, and the name, address and job title of the present custodian of such communications (or alternatively attach copies of same hereto).

ANSWER:

(a) GM has no knowledge of any specific notice relative to asbestos exposures associated with any asbestos-containing product manufactured by GM. Based upon reports which appeared in the literature in 1975 and 1976, which reports are still open to scientific dispute and debate, GM, in August, 1975, placed cautionary warnings on its brake parts and later in its service manuals as described in preceding answers to Interrogatories. See answer to Interrogatory No. 10(e), supra. As used in this Interrogatory, the term "health hazard" has not been defined. It is General Motors' position that a "health hazard" with respect to its products will only arise if the products are improperly used.

(b) See answer to Interrogatory No. 47(a), supra.

(c) See answer to Interrogatory No. 47(a), supra.

(d) See answer to Interrogatory No. 47(a), supra.

(e) See answer to Interrogatory No. 47(a), supra.

PRODUCED BY FORD