

Subject to and without waiving the foregoing objections, please see Defendant's response to Interrogatory No. 32 which response is incorporated herein as if restated verbatim.

35. Prior to 1968, did any person file a claim against a Worker's Compensation carrier covering Defendant or any of its subsidiaries or predecessors alleging that he/she contracted a disease from inhaling asbestos fibers? If so, provide:
- (a) A list of the claims, including each claimant's name, address and the date each claim was filed, and including the caption and jurisdiction of the claim.
 - (b) The disease alleged in each such claim.
 - (c) A brief summary of the disposition of each such claim.
 - (d) The name, address and title of the person having custody of the records pertaining to each such claim.

ANSWER:

Defendant objects to Interrogatory No. 35 to the extent it inquires of "predecessor companies" without identifying or defining such. Moreover, the interrogatory calls for a legal conclusion as to what companies are "predecessors" without setting forth a factual or legal foundation for such an opinion. Further, the interrogatory is overly broad, general and global because it inquires of injuries resulting from products other than those involved in this lawsuit and refers to claimants other than those named as Plaintiffs herein. Thus, the interrogatory seeks information which is irrelevant and immaterial to any issue in this lawsuit and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, because GM does not maintain an index of workers' compensation claims related to exposure of particular materials and because claims are not kept in a central location but at or near the facilities where the claimant worked, this interrogatory would impose an undue burden upon Defendant to so index costing GM extreme and unnecessary time, expense and manpower. Subject to and without waiving the foregoing objections, GM will make workers' compensation claims records available for review by Plaintiffs' counsel, at the facilities where they are maintained, at mutually convenient times.