

is vague, ambiguous, overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 28:

As to the disease Mesothelioma, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned such disease was caused by inhalation of asbestos fibers by humans.
- B. The date on which Defendant first suspected that Mesothelioma was caused by inhalation of asbestos dust and fibers.
- C. How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.
- D. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.
- E. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- F. Whether any such information is still maintained by Defendants or its subsidiary or predecessor in a written form.
- G. Who is the custodian of such information.
- H. Whether Defendant agrees that there is no known medical cure for Mesothelioma.

RESPONSE:

Mesothelioma is found in people who have had prolonged, excessive exposure to respirable amphibole asbestos fibers, as well as in people with no history or indications of asbestos exposure. GM does not know of a cure for mesothelioma. GM cannot determine when any of its hundreds of thousands of current or past employees first heard of these "consequences or effects." To the best of GM's knowledge, however, there is no