

cannot identify every book or other written material on this subject. GM has hundreds of facilities located throughout the United States, many libraries, and many documents that are not indexed in a manner that would permit retrieval. GM objects to this request because it is vague, overly broad, unduly burdensome, and not likely to lead to admissible evidence.

INTERROGATORY NO. 20:

Has Defendant or any of its subsidiary or predecessor companies at any time been a member of any trade organization or association that published or disseminated any documents or information relating to the hazards of asbestos comprised of other manufacturers, miners, marketers, and/or sellers of asbestos products? If so, state:

- (a) The name and address of each such association or organization.
- (b) The dates during which Defendant or any of its subsidiaries or predecessors were members.
- (c) The names and dates of any publications, minutes, or reports published, written, or disseminated by any of the named associations or organizations.
- (d) Whether any of those publications are still in your possession, and if so:
  - (i) A description of the publications, including the date.
  - (ii) The current location of such publications.
  - (iii) The custodian of such publications.
  - (iv) The method or manner in which such publications are maintained.

RESPONSE:

GM has been a member of numerous organizations from 1930 to the present. GM assumes that it received whatever items were