

no recognized, scientific substantiation that brake linings create an increased risk of illness to consumers or people who do repairs. GM objects to the rest of this interrogatory because it is vague, ambiguous, overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 30:

Does Defendant contend that asbestos products can be manufactured or designed so as to eliminate all potential health hazards to persons working with or exposed to them? If the answer is affirmative, explain in detail, and attach any studies or surveys on which this answer is based.

RESPONSE:

The asbestos-containing brake linings and clutches that GM manufactures and distributes do not pose any significant risk to mechanics who install and remove them from cars and trucks. *See also* response to 19. GM objects because this interrogatory is overly broad, vague, burdensome, and unlikely to lead to admissible evidence.

INTERROGATORY NO. 31:

Describe in detail the types of packages or packaging which Defendant or any of its subsidiary or predecessor companies used for asbestos material or products, listing the dates each type of package was used, a physical description of each type of package, and providing a description of any printed material or trademarks that appeared thereon.

RESPONSE:

Drum Brake Linings

Service parts were shipped in corrugated boxes sized closely to the size and configuration of the parts. The name "Delco" was used on some boxes containing service parts as early as 1936. Boxes with the name "Delco" and colors red and black on white were used beginning in 1958 and later changed to red and blue on