(e) GM does not know the precise asbestos content of facing materials that others manufactured. It is a known industry practice, however, to use chrysotile asbestos.

(f) Distribution of service parts continues.

(g) During the 1980s to present for original equipment.

(h) An example of a typical assembly for a passenger car includes a facing with an inside diameter of 2.3; millimeters, an outside diameter of 156 millimeters, and a thickness of 8 millimeters. The facing is typically dark brown.

(i) Clutch driven plates assemblies are one component part of a manual transmission.

(j) *See* response to (f).

INTERROGATORY NO. 7:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the design, preparation, or introduction into the market of the products listed in Interrogatory No. 6 still exist? If so, state:

A. A description of each such document.

B. The name, address, and job title of each person who currently has possession of each document, and where the documents are currently located.

RESPONSE:

GM responds that some documents exist, but not for the entire period of sixty or more years. Engineering drawings, specifications, and manufacturing documents for drum and disc brake linings are generally located at the Delco Chassis Division of GM in Dayton, Ohio. There is no existing list of all of these documents and it would be very time-consuming and expensive to try to compile such a list. GM objects to this interrogatory