

RESPONSE:

See responses to 8 and 11 about brake repairs. GM objects to this interrogatory because it is overly broad, unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 57:

As to either the threshold limit values or maximum allowable concentrations of both asbestos dust and total dust provided by the American Conference of Governmental Industrial Hygienists, state:

- A. The year in which Defendant or any predecessor(s) or subsidiaries were first advised of such limits or concentrations;
- B. The name of the employee or official of the company receiving such advice;
- C. How Defendant received notice of such limits or concentrations.

RESPONSE:

GM would have become aware of the recommended threshold limit values or maximum allowable concentrations established by the American Conference of Governmental Industrial Hygienists shortly after their adoption and publication. Because these values have existed for many years, GM cannot identify the specific employee who first received the information.

To the extent this interrogatory asks for more information, GM objects because it is vague, overly broad, burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence.