

Defendant objects to Interrogatory No. 8 because it is overly broad, general and global and seeks information which is irrelevant and immaterial and it is not reasonably calculated to lead to the discovery of admissible evidence at the trial of this lawsuit. Specifically, the interrogatory inquires about ingredients other than asbestos contained in the products listed. Further, the interrogatory fails to define "potential health hazards" and is, therefore, not only overly broad, but vague, indefinite and ambiguous. Moreover, the interrogatory fails to identify, define or limit in any way "any tests." Finally, the interrogatory seeks information which is protected by the attorney work product, investigative and third-party communication privileges set forth in Rule 166b of the Texas Rules of Civil Procedure. Subject to and without waiving the foregoing objections, Defendant conducted air sampling in dealership settings on December 8-11, 1975. W.H. Krebs conducted the air sampling at Circle Buick, New York, New York; West Side Pontiac, New York, New York, and Circle Buick-East, New York, New York. On February 13, 1984, W.H. Krebs did air sampling to evaluate the nature and extent of operator exposures to airborne asbestos while performing brake lining resurfacing operations at Pekin Machine & Parts Company, Pekin, Illinois. GM will produce copies of these reports.

9. 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 testing of the products referred to in Interrogatory No. 6 now 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 it is presently located.

**ANSWER:**

Please see Defendant's answer and objections to Interrogatory No. 8, which answer and objections are incorporated by reference herein as if restated verbatim. Further, Defendant objects to Interrogatory No. 9 to the extent that it is overly broad, general and global because of the use of such language as "including but not limited to" and "other written materials of any kind or character." In this regard, the interrogatory is also vague, ambiguous and indefinite. Finally, the interrogatory seeks information which is protected by the attorney work product, investigative and third-party communication privileges set forth in Rule 166b of the Texas Rules of Civil Procedure.