

There is no compilation of the information requested for purchases of asbestos fiber from 1939 to present. Most records relating to purchases for the relevant time period are no longer available because of normal record retention policies. GM also objects because the interrogatory is overly broad, unduly burdensome, and asks for irrelevant information.

20. Did Defendant, Defendant's predecessors or Defendant's subsidiaries ever market or distribute any asbestos-containing product manufactured in whole or in part by someone else? If so, please state the following for each such product:
- A. The name and address of the manufacturer;
 - B. The product's trade and brand name;
 - C. The organizational unit of Defendant, the predecessor or subsidiary who did so;
 - D. Date(s) beginning, ending and during which the marketing or distributing took place;
 - E. Whether the product was distributed through the same channels as those used for products manufactured by Defendant, and if not, please explain the exact channels of distribution; and,
 - F. Identify all documents relating to the marketing or distribution.

RESPONSE:

Yes. Brake linings purchased from Johns-Manville, Abex Corporation, Eaton Brake Division, Dana Axle, American Coleman, B.F. Goodrich, Bendix, Dayton Walther, H.K. Porter, Kelsey Hayes, Kelsey Products Division, Rockwell International, Unibond Brake, Wagner Electric, Raybestos Manhattan, Friction Division Products, Ferodo, ITT AMCO, Multibestos, Universal Friction, Akebono, AMCO and Marshall Eclipse were installed on the cars, trucks and buses assembled by GM or sold as replacement parts by GM's car and truck divisions or by AC Delco or GM Parts. Notwithstanding this response, GM objects because the interrogatory is overly broad, vague, ambiguous, unintelligible, burdensome and harassing. It also asks for information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence.