

- d. Not applicable.
- e. GM combined chrysotile and other ingredients to produce asbestos-containing brake linings at plants operated by Inland Division (later Delco Products and Delco Chassis Divisions) in Dayton, Ohio (1939-1964) and Vandalia, Ohio (1962-present).
- f. See e.
- g. GM drum brake linings contain one or more grades of chrysotile asbestos. The total percentage of chrysotile asbestos used is in a range of approximately 50% to 75%.

The precise formulations used in GM drum brake lining segments are valuable proprietary information. This information is disclosed only within GM on a need-to-know basis. These formulations are the result of decades of investment of time and money. Disclosure of this information would put GM at a serious competitive disadvantage because domestic and foreign competitors could duplicate GM's products without having to undertake the lengthy and expensive laboratory and vehicle testing program undertaken by GM. Competitors could also use this information to improve their products and processing methods without having to compensate GM for its efforts. This subpart is also overly broad, unduly burdensome, and is unlikely to lead to admissible evidence. Therefore, GM objects.

h. Chrysotile

i. Chrysotile was purchased from:

Johns Manville Corp. 1975 - 1984
Box 517
Toledo, Ohio

Asbestos Fibre Corp. 1939 - 1975
Asbestos Corporation, Ltd.
c/o C. L. Zimmerman Co.
N-303 Cincinnati Union Terminal
Cincinnati, Ohio 43203

Lake Asbestos of Quebec, Ltd. 1977 - 1985
Box 608
Black Lake, Quebec

JM Asbestos Sales, Inc. 1984 - 1985
Asbestos, Quebec

- j. Drum brake lining segments consist of a curved, dense, grayish material. Typical arc lengths range from 90 degrees to 130 degrees and are for drum diameters of 7, 8, 9- 1/2, 11, 12 and 12-1/2 inches.
- k. Service parts were shipped in corrugated boxes sized closely to the size and configuration of the parts. The name "Delco" was used on some