

INTERROGATORY NO. 35:

Prior to 1968, did any person file a claim against a Worker's Compensation carrier covering Defendant or any of its subsidiaries or predecessors alleging that he/she contracted a disease from inhaling asbestos fibers? If so, provide:

- A. A list of the claims, including each claimant's name, address and the date each claim was filed, and including the caption and jurisdiction of the claim.
- B. The disease alleged in each such claim.
- C. A brief summary of the disposition of each such claim.
- D. The name, address and title of the person having custody of the records pertaining to each such claim.

RESPONSE:

Records of workers' compensation claims are not indexed in a way that would enable GM to isolate claims related to an exposure to a particular material, like asbestos. In addition, workers' compensation records are not maintained in one central location, but are kept at or near the facilities where the claimant worked. Therefore, there is no compilation from which information can be obtained to respond to this interrogatory. However, GM will make workers' compensation claims records available for plaintiffs' lawyers' review at the facilities where they are maintained, at times convenient for all. GM also objects because the interrogatory is vague, overly broad, burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 36:

Did Defendant or any of its subsidiaries or predecessors maintain written minutes of corporate meetings, either board of directors, departmental, or otherwise, which reflect discussions pertaining to any subject matter related to asbestos, asbestos health hazards or asbestos products? If so, for each such set of minutes, state: