

- (d) The year each such written material or instruction was prepared and disclosed to potential consumers.

RESPONSE:

GM's recommendations for maintaining and servicing brake linings and transmission clutches are contained in numerous service manuals. Copies of relevant excerpts and/or manuals will be made available for inspection on reasonable notice at the office of defendant's counsel. GM also objects to this interrogatory because it is overly broad, burdensome, oppressive and not likely to lead to admissible evidence.

INTERROGATORY NO. 24:

Does Defendant have insurance policies that might cover the claims made by Plaintiffs in these cases? If so, list the name of each insurance carrier, the amount of initial coverage, amount of coverage remaining at the present time, and the effective dates of each policy. (If properly answered, this Interrogatory need not be supplemented as to the remaining amount of coverage).

RESPONSE:

GM obtained comprehensive general liability coverage from and through American International Specialty Lines Insurance Company, New York, New York. The coverage provided is adequate to satisfy any judgment that may be rendered against GM in this action. This coverage is in effect for all relevant times in this case. GM objects to providing any further information called for in this interrogatory as such information is irrelevant to the issues of this case and not reasonably calculated to lead to the discovery of admissible evidence.