

conclusion for which there is no factual basis or foundation. Further, the interrogatory is argumentative, implying that the asbestos-containing products pose the same risk as free asbestos fibers and assumes facts not in evidence and/or not recognized by the medical community regarding asbestos. Moreover, the interrogatory is overly broad, calls for medical conclusions, seeks irrelevant and immaterial information and is not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory also inquires of the knowledge of several hundreds of thousands employees, past and current and, therefore, imposes an undue burden upon Defendant. Further, the interrogatory requests information which goes well beyond the standard of knowledge or care required of GM under Texas law in that it requests information regarding circumstances which have no applicability to the types of products manufactured by this Defendant or the circumstances reasonably anticipated for users of this Defendant's product. 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, gastro-intestinal, laryngeal, pharyngeal and lymphatic cancers have been theorized to have many different causes. GM cannot determine when any of its present or past employees may have first heard of a theory that one of these cancers was caused by or associated with some type of asbestos exposure. However, to the best of GM's knowledge, there is no recognized scientific substantiation that brake linings create an increased risk of illness to consumers or people who do repairs.

30. Does Defendant contend that asbestos products can be manufactured or designed so as to eliminate all potential health hazards to persons working with or exposed to them? If the answer is affirmative, explain in detail, and attach any studies or surveys on which this answer is based.

ANSWER:

Defendant objects to Interrogatory No. 30 to the extent it is argumentative and seeks medical conclusions. Further, it inquires of products other than those involved in this lawsuit and includes "all potential health hazards" and, therefore, is overly broad, general, and global and seeks information which irrelevant and immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the interrogatory is vague, ambiguous and indefinite because it fails to identify, define or limit "potential health hazards." Subject to and without waiving the foregoing objections, every product has some risks associated with it -- people get cuts from pieces of paper. A