

REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce a true and correct copy of each photograph of each asbestos-containing product identified in answer to Interrogatory No. 4.

RESPONSE:

Illustrations or sketches of products are included in the service manuals and advertising samples described in GM's responses to interrogatories. GM objects to this request because it is overly broad, burdensome and oppressive and it is not reasonably particular about what is being requested.

REQUEST FOR PRODUCTION NO. 2:

Please produce any diagrams or schematics indicating, stating or detailing the existence of any of your subsidiaries, predecessors, or divisions as defined on Page 1 of these Interrogatories and Request for Production.

RESPONSE:

As one would expect in an organization that has existed since 1916, conducting operations throughout the U.S.A and several other countries, with numerous divisions that have in the past or now exist or that have been, in some manner over the years, reorganized, and that conducts many different types of business operations, GM has many documents that might be considered to depict its organization. However, the vast majority of GM's operations have nothing to do with the manufacture or distribution of asbestos-containing products. In addition, GM does not know the number of documents that may possibly be responsive to this request, nor does it know the extent to which those possibly responsive documents from the past 78 years have been retained. Accordingly, GM objects to this