

D. Whether, as a result of the tests, any products were removed from the market.

E. The names of all products removed from the market as a result of these tests.

RESPONSE:

GM does not know of any study establishing that potential exposures to asbestos during brake repair operations constitute a health hazard. However, GM conducted air sampling for asbestos during routine brake maintenance operations and found that the exposures, if any, were below the permissible exposure limit. GM has also conducted a study that showed the emissions from brakes are substantially less than one percent asbestos. GM will make copies available for inspection at the office of its counsel at a mutually convenient time. *See also* response to 8. GM objects to this interrogatory because it is overly broad, argumentative and not likely to lead to admissible evidence.

INTERROGATORY NO. 12:

Do any documents, including written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the potential health hazards of the products listed in Interrogatory No. 6 now exist? If so, state:

A. The name of each product.

B. A description of each document and how it relates to each product.

C. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

RESPONSE:

*See* responses to 7 and 11. GM objects to this interrogatory because it is vague, overly broad, and it will not lead to admissible evidence.