

- (b) The date of notice of each claim.
- (c) A description of the claim.
- (d) The type of injuries allegedly sustained.
- (e) The name and address of each attorney who represents each individual making a claim.
- (f) The style and court number of each claim.
- (g) The disposition of each claim that has been settled or taken to judgment.

RESPONSE:

GM has no record of having received notice of personal injury actions in Texas State Courts or claim alleging injury from exposure to asbestos from a GM product before 1970.

INTERROGATORY NO. 16:

Were your asbestos products distributed, marketed, packaged, labeled and/or sold by companies other than your own? If the answer is affirmative, list the names and addresses of each of those companies, and the products in question.

RESPONSE:

GM customarily sells its cars, trucks, and replacement parts to authorized dealers and distributors who then resell them. The ultimate buyers do not purchase GM products directly from GM. Records of GM's sale of replacement parts for most, if not all, of the relevant time period are no longer available. GM does not have records of sales of parts by dealers or distributors.

GM objects to this interrogatory because it is argumentative, misleading, overly broad, unduly burdensome, and will not lead to admissible evidence.