

RESPONSE:

The corporate medical directors of GM have been:

Clarence Selby, M.D.	(1935-1949)
Max Burnell, M.D.	(1949-1958)
S.D. Steiner, M.D.	(1958-1976)
R.G. Wieneck, M.D.	(1976-1980)
R.W. Prior, M.D.	(1980-1988)
B.B. Van Brocklin, M.D.	(1988-present)

The directors of the GM Industrial Hygiene Department were:

L.B. Case	(1936-1945)
F.A. Patty	(1945-1960)
V.J. Castrop	(1960-1975)
G.L. Kortsha	(1976-1989)
W.H. Krebs	(1990-1993)

Physicians and industrial hygienists have been employed at GM locations throughout the United States, but there is no central listing of all those people during the past forty years. GM objects to this interrogatory because it is overly broad, unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 19:

Does Defendant have in its possession any books, pamphlets, memoranda, or written materials of any kind or character that would indicate that asbestos fibers, when inhaled, can be hazardous to the health of human beings? If so, state:

- A. The name of each such publication.
- B. The date of publication and the names of the author and publisher (if any).
- C. The date received by Defendant, if known.
- D. The name, job title, and address of each person who currently has possession of each publication and its present location.