(h) A description of the physical appearance of each of the named products.

(i) A detailed description of the intended uses of the named products.

(j) Identify the last year that you sold each asbestos-containing product.

RESPONSE:

AS TO DRUM BRAKE LININGS:

(a) GM began the manufacture of molded drum brake linings containing chrysotile asbestos in 1939.

(b) Outside suppliers of drum and disc brake linings were Johns-Manville, Abex Corporation, Eaton Brake Division, Dana Axle, American Coleman, Delco Moraine, Inland/Inlite, B.F. Goodrich, Bendix, Dayton Walther, H.K. Porter, Kelsey Hayes, Kelsey Products Division, Rockwell International, Unibond Brake, Wagner Electric, Raybestos Manhattan, Friction Division Products, Ferodo, ITT AMCO, Multibestos, Universal Friction, Akebono, AMCO and Marshall Eclipse;

(c) Trade Names: United Motors (1918-1961), United Delco (1961-1974), AC-Delco (1974-present), Delco Moraine (1942-present), GM Parts (unknown date before 1969-present), Goodwrench (1985-present), Buick*, Cadillac*, Chevrolet*, GMC Truck*, Oldsmobile*, or Pontiac*. Dates are approximate. Names marked with an asterisk were used, if at all, for an unknown period of time before 1969.

(d) See response to (a);

(e) GM drum brake linings have one or more grades of chrysotile asbestos, generally grades 5, 6 and 7. The approximate percentage by weight ranged between 50% to 75%. The grade of chrysotile asbestos in drum brake linings GM purchased is unknown. The details of the formulations for friction materials are trade secrets, the disclosure of which is unnecessary in this case and would destroy the value of GM's investment in their development.

(f) GM continues to manufacture drum brake linings containing chrysotile.

(g) Not applicable.