

The corporate medical directors of GM were:

Clarence Selby, M.D. (1935-49)
Max Burnell, M.D. (1949-58)
S.D. Steiner, M.D. (1958-76)
R.G. Wiencek, M.D. (1976-80)
R.W. Prior, M.D. (1980-88)
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)
W.B. Kilgore, Manager, NAO Industrial Hygiene	(1993-Present)

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.

RESPONSE:

GM has not conducted studies to determine the possible effects of inhalation of asbestos fibers and GM cannot determine when the first of any of its hundreds of thousands of current or past employees may have learned of a possible harmful effect to humans from an excessive exposure to asbestos fiber in any form. GM