

- k. Service parts were shipped in corrugated boxes sized closely to the size and configuration of the parts. Boxes with the name "Delco" and colors red and black on white were used beginning in 1958 and afterwards were changed to red and blue on white. Boxes with the name "GM Parts" and colors black and aqua on white have been used since 1974. Boxes with the name "Gondwrench" and colors of black and gray on white have been used since 1985. In addition to the brand name, the box or a label contains a boxmaker's certificate and box number. Plain white boxes marked with "AMC" and AMC part numbers were used beginning in approximately 1968.
- l. See response to 4 and k.
- m. Patents are a matter of public record and are equally available to plaintiff.
- n. After 1985, GM used asbestos-containing disc brake linings manufactured by others. Disc brake linings not containing asbestos are separate products with different performance characteristics, so characterization of "deletion of asbestos" is misleading and incorrect.
- o. GM stopped manufacturing because it was more economical to obtain the product from other sources. There is no "replacement product." Disc brake linings not containing asbestos have different performance characteristics and are designed for different brake systems.
- p. Since 1967, disc brake linings have had "DM" and a certification code with a first digit of the certification code of "1" or "2" printed on the edge of the lining.
- q. GM does not understand this question.
- r. GM does not understand this question.
- s. Beginning generally in 1975, the following statement was either printed directly on cartons or on labels on cartons containing replacement brake linings:

CAUTION: CONTAINS ASBESTOS-FIBERS.
AVOID CREATING DUST. BREATHING
ASBESTOS DUST MAY CAUSE SERIOUS BODILY HARM.

Beginning in August of 1989, the statement was changed to the following:

DANGER: CONTAINS ASBESTOS FIBERS.
AVOID CREATING DUST. CANCER AND LUNG
DISEASE HAZARD. DO NOT GRIND.
DO NOT CLEAN WITH COMPRESSED AIR.
• SEE SERVICE MANUAL INSTRUCTIONS •

- t. United States.