

mechanic could be allergic to some ingredient in a brake lining or could drop it on his or her foot. Therefore, the answer to this interrogatory is "no," but the asbestos-containing brake linings manufactured and distributed by GM do not pose any significant risk to mechanics who install and remove them from cars and trucks.

31. Describe in detail the types of packages or packaging which Defendant or any of its subsidiary or predecessor companies used for asbestos material or products, listing the dates each type of package was used, a physical description of each type of package, and providing a description of any printed material or trademarks that appeared thereon.

ANSWER:

Defendant objects to Interrogatory No. 31 to the extent it inquires of "predecessor companies" without identifying or defining such. Moreover, the interrogatory calls for a legal conclusion as to what companies are "predecessors" without setting forth a factual or legal foundation for such an opinion. Further, the interrogatory is overly broad, general and global and seeks information which is irrelevant and immaterial to any issue in this lawsuit and is not reasonably calculated to lead to the discovery of admissible evidence. Finally, the interrogatory seeks information which is duplicative of other interrogatories, specifically Interrogatory Nos. 14 and 23. In this regard, the interrogatory is harassing and oppressive. Subject to and without waiving the foregoing objections, Defendant answers as follows:

Drum brake linings:

Service parts were shipped in corrugated boxes sized closely to the size and configuration of the parts. The name "Delco" was used on some boxes containing service parts as early as 1936. Boxes with the name "Delco" and colors red and black on white were used commencing in 1958 and subsequently changed to red and blue on white. In addition to the brand name, the box or a label contains a boxmaker's certificate and box number.

Disc brake linings:

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 commencing in 1958 and subsequently changed to red and blue on white. Boxes with the name "GM Parts" and colors black and