

- E. The geographical area into which you claim the asbestos-containing product(s) were sold.

RESPONSE:

Yes.

- A. Asbestos-containing drum brake linings were sold from the 1920's to present and asbestos-containing disc brake linings were sold from 1966 to present.
- B. See A.
- C. Not applicable.
- D. Not applicable.
- E. 50 states and the District of Columbia.
13. For the period 1930 to date, state the addresses and business telephone numbers of each facility, building, mine, mill or location which was used by you as a mining, milling, manufacturing, processing, distribution or marketing facility for asbestos-containing products, state the inclusive dates each such facility was in operation, and further state its function (e.g. manufacturing, warehousing finished products, sales office; etc.).

RESPONSE:

GM has not mined, milled or processed asbestos fiber. GM manufactured asbestos-containing drum and disc brake linings at plants operated by Inland Division (later Delco Products and Delco Chassis Divisions) in Dayton, Ohio (1939-1964) and Vandalia, Ohio (1962-present) and Delco Moraine Division (1966-1985) in Dayton, Ohio. From 1930 to present, GM has had numerous parts packaging and warehousing facilities and it would be extremely burdensome to attempt to identify all of them. GM objects to this interrogatory because it is overly broad and unduly burdensome.

14. Please identify each distributor or wholesaler of your asbestos-containing products since 1930 either located in the Commonwealth of Pennsylvania or authorized to sell into this state. For each distributor or wholesaler, please state:
- A. Their last known addresses;