

FILE NAME: General Motors (GM)

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|-----------------------|---|--------------------------|
|                       | § | IN THE DISTRICT COURT OF |
|                       | § |                          |
| IN RE: ASBESTOS CASES | § | HARRIS COUNTY, TEXAS     |
|                       | § |                          |
|                       | § | MASTER ASBESTOS FILE     |

**SUPPLEMENTAL RESPONSES OF DEFENDANT  
GENERAL MOTORS CORPORATION TO PLAINTIFFS' INTERROGATORIES**

**INTERROGATORY NO. 3:**

List by brand name all of your asbestos-containing products. Your asbestos-containing products includes all products which contain any amount of asbestos manufactured, sold, designed, supplied, distributed, mined, milled, relabeled, resold, processed, applied or installed by you or for you by others. By you and yours, Plaintiffs refer to Defendant, to all of your predecessors in interest, (whether by purchase, merger, consolidation or otherwise), to all of your subsidiaries, divisions, joint ventures or affiliates. As to each product, state the following:

- a. type of product (e.g., acoustical plaster, fireproofing, etc.);
- b. the date the product first went into production;
- c. the last date the product was produced;
- d. the last date the product was sold;
- e. all manufacturing locations;
- f. dates of manufacture at each location;
- g. the percentage of asbestos (state if percentage is by volume or weight), and the dates and all reasons for any modification thereof;
- h. the type of asbestos;
- I. the specific source of asbestos with dates;
- j. the color, physical characteristic, and appearance of the product;

- k. a full and precise description of the package in which the product was sold, including, but not limited to, type of package, size, color(s), and writings thereon;
- l. all other names under which the product was sold;
- m. the number and dates of each patent or patent application as to the product;
- n. if the product continued to be produced after the deletion of asbestos, all reasons why the asbestos was deleted, the identity of the person who made the decision to delete the asbestos, and the date the product was first produced without the asbestos;
- o. if the product is no longer produced, all reasons it was discontinued, the identity of the person who made the decision to discontinue the product, the brand name of the replacement product, and the date the replacement product first went into production;
- p. a precise description of your identifying logo or initial and the dates of inclusion on the product;
- q. state during what period of time such product has been associated with defendant;
- r. identify all sales literature, including brochures, advertisements, pamphlets or other material describing such product, its uses and methods of application or installation;
- s. identify any warning labels, inserts or other writings provided with such product and with every such printed warning, state what period of time it has or had accompanied the product, the exact wording of the warning, any amendments made to the wording, where the warning was located on each product or packaging, and on what asbestos products the warning appear(ed);
- t. geographic distribution range of each such product.

RESPONSE:

I. Drum brake linings

- a. Drum brake linings.
- b. GM began manufacturing drum brake linings in 1939.

- c. Not applicable.
- d. Not applicable.
- e. GM combined chrysotile asbestos fiber and other ingredients to produce asbestos-containing 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).
- f. See e.
- g. GM drum brake linings contain one or more grades of chrysotile asbestos. The total percentage of chrysotile asbestos used is in a range of approximately 50% to 75%.

The formulations GM used in manufacturing drum brake linings are valuable proprietary information. This information is disclosed only within GM on a need-to-know basis. These formulations are the result of decades of investment of time and money. Disclosure of this information would put GM at a serious competitive disadvantage because domestic and foreign competitors could duplicate GM's products without having to undertake the lengthy and expensive laboratory and vehicle testing program undertaken by GM. Competitors could also use this information to improve their products and processing methods without having to compensate GM for its efforts. This subpart is also overly broad, unduly burdensome, and is unlikely to lead to the discovery of admissible evidence. Therefore, GM objects.

- h. Chrysotile.
- i. Johns Manville Corp. 1975-1984  
Box 517  
Toledo, Ohio
- Asbestos Fibre Corp. 1939-1975  
Asbestos Corporation, Ltd.  
c/o C. L. Zimmerman Co.  
N-303 Cincinnati Union Terminal  
Cincinnati, Ohio 45203

Lake Asbestos of Quebec, Ltd.  
Box 608  
Black Lake, Quebec

1977-1985

JM Asbestos Sales, Inc.  
Asbestos, Quebec

1984-1995

- j. Drum brake lining segments consist of a curved, dense, grayish material. Typical arc lengths range from 90 degrees to 130 degrees and are for drum diameters of 7, 8, 9-1/2, 11, 12 and 12-1/2 inches.
- k. See response to No. 2. 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. Boxes with the name "GM Parts" and colors black and aqua on white have been used since 1974. Boxes with the name "Goodwrench" and the 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.
- l. See response to Nos. 2 and k.
- m. Patents are a matter of public record and are equally available to plaintiff.
- n. Not applicable.
- o. Not applicable.
- p. Since the use of the certification codes began in 1967, the edge of drum brake lining segments has been marked with the name "DELCO" and a certification number with a first digit of "2."
- q. GM does not understand this question.
- r. GM will provide samples of Material Data Safety Sheets, service manuals and sales brochures for brake linings. However, GM could not begin to provide copies of all sales brochures, dealer brochures, parts catalogues, etc., for each car or truck that had asbestos containing brakes or for each brake lining it has manufactured. GM objects to this request because it is extremely over broad and burdensome and asks for documents and details that are unlikely to lead to admissible evidence.

- 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:

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. Throughout the United States.

## II. Disc Brake Linings

- a. Disc brake linings
- b. GM began manufacturing disc brake linings in the 1966 model year.
- c. GM ceased manufacturing asbestos-containing disc brake linings in 1985.
- d. Not applicable.
- e. Delco Moraine Division, Dayton, Ohio.
- f. See b, c and e.
- g. The total percentage of all grades of chrysotile asbestos used from 1966 to 1985 was in a range of approximately 30% to 60%.

The formulations GM used in manufacturing drum brake linings are valuable proprietary information. This information is disclosed only within GM on a need-to-know basis. These formulations are the result of decades of investment of time and money. Disclosure of this information would put GM at a serious competitive disadvantage because domestic and foreign competitors could duplicate GM's products without having to undertake the lengthy and expensive

laboratory and vehicle testing program undertaken by GM. Competitors could also use this information to improve their products and processing methods without having to compensate GM for its efforts. This subpart is also overly broad, unduly burdensome, and is unlikely to lead to the discovery of admissible evidence. Therefore, GM objects.

- h. Chrysotile.
- i.
 

|                                |               |
|--------------------------------|---------------|
| Asbestos Corp., Ltd.           | 1967-1970     |
| Lake Asbestos                  | 1967-1970     |
| <br>C. L. Zimmerman Co.        | <br>1972-1977 |
| 3655 Central Parkway           |               |
| Cincinnati, Ohio               |               |
| <br>Canadian Johns-Manville    | <br>1967-1984 |
| Asbestos, Quebec               |               |
| <br>National Gypsum Co.        | <br>1972      |
| Cleveland, Ohio                |               |
| <br>Union Insulating Co.       | <br>1976      |
| Parkersburg, W. Virginia       |               |
| <br>Chrysler Chemical Division | <br>1978      |
| Trenton, Michigan              |               |
- j. Disc brake lining segments consisted of a dense, grayish or tan material. Typical dimensions are height of 57-63 millimeters, width of 125-142 millimeters, and thickness of 11-13 millimeters.
- k. See response to No. 2. 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 aqua on white have been used since 1974. Boxes with the name "Goodwrench" and the 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.
- l. See response to Nos. 2 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 that do not contain asbestos are separate products with different performance characteristics, so it is not correct to describe the change as "the deletion of asbestos."
- o. GM stopped manufacturing asbestos-containing disc brake linings because it was more economical to obtain them from other sources. There is no "replacement product." Disc brake linings that do not contain 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 will provide sample Material Data Safety Sheets, service manuals and sales brochures for drum linings. However, GM could not begin to provide copies of all sales brochures, dealer brochures, parts catalogues, etc., for each car or truck that had asbestos containing brakes or for each disc lining it has manufactured. Gm objects to this request because it is extremely over broad and burdensome and asks for documents and details that are not relevant or likely to lead to admissible evidence.
- 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:

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. Throughout the United States.

SUPPLEMENTAL RESPONSE:

Drum Brake Linings

- a. Drum Brake Linings;
- b. GM began to manufacture molded drum brake linings containing chrysotile asbestos in 1939;
- c. GM continues to manufacture drum brake linings.;
- d. GM continues to manufacture drum brake linings;
- e. GM manufactured asbestos-containing brake shoes and disc pads at plants operated by Inland Division (later Delco Products and Delco Chassis, and Delphi Chassis Divisions) in Dayton, Ohio from 1939 to 1964, and Vandalia, Ohio from 1962 to the present, and at the Delco Moraine Division in Dayton, Ohio from 1966 to 1985;
- f. See response to subpart e;
- g. The approximate percentage by weight ranged between 50% to 75%. GM does not know the grade of chrysotile asbestos in the drum brake linings it purchased;
- h. Chrysotile;
- i. Chrysotile for drum brake linings was purchased from:

|                                 |             |
|---------------------------------|-------------|
| Asbestos Fibre Corp.            | 1939 - 1975 |
| Asbestos Corporation, Ltd.      |             |
| c/o C. L. Zimmerman Co.         |             |
| N-303 Cincinnati Union Terminal |             |
| Cincinnati, Ohio 45203          |             |

|                      |             |
|----------------------|-------------|
| Asbestos Corp., Ltd. | 1967 - 1970 |
|----------------------|-------------|

|                      |             |
|----------------------|-------------|
| Johns Manville Corp. | 1975 - 1984 |
| Box 517              |             |
| Toledo, Ohio         |             |

Lake Asbestos of Quebec, Ltd.  
Box 608  
Black Lake, Quebec

1977 - Present

JM Asbestos Sales, Inc.  
Asbestos

1984 - Present

- j. Drum brake lining segments consist of a solid, curved, dense, grayish material. Typical arc lengths range from 90 degrees to 130 degrees and are for drum diameters of 7, 8, 9 ½, 11, 12 and 12 ½ inches;
- k. 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 the colors red and black on white were used beginning in 1958 and later the colors were 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;
- l. 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 with an asterisk were used, if at all, for an unknown period of time before 1969;
- m. Patents are a matter of public record and are equally available to plaintiff. As to brake linings, GM has obtained the following patents:

| Patent Number | Date Issued |
|---------------|-------------|
| 2,819,987     | 01/14/58    |
| 2,569,539     | 10/02/51    |
| 2,553,215     | 05/15/51    |
| 2,476,588     | 07/19/49    |
| 2,452,284     | 10/26/48    |
| 2,379,166     | 06/26/45    |
| 2,369,583     | 12/13/45    |
| 2,359,361     | 10/03/44    |
| 2,332,737     | 10/26/43    |
| 2,264,901     | 12/02/41    |
| 2,251,410     | 08/05/41    |
| 2,221,400     | 11/12/40    |
| 2,134,181     | 10/25/38    |

|           |          |
|-----------|----------|
| 1,969,041 | 08/07/34 |
| 1,844,461 | 02/09/32 |
| 1,757,408 | 05/06/30 |

- n. Not applicable;
- o. Not applicable;
- p. Brake linings have contained an edge code and certification number since about 1967. For drum brake linings manufactured by GM, the edge code is "DELCO" and the certification code begins with "2." Drum brake shoes manufactured by GM have contained the marks "Delco Moraine" or "DM" or a logo that depicts the outline of two brake shoes. Drum brake shoes with these markings may be relined by various manufacturers with non-GM linings.

Drum brake linings manufactured by others have been purchased by GM for installation on automobiles and light duty trucks. To GM's best current knowledge, the following suppliers and approximate dates have been identified, but from information available, it is impossible to determine if all products supplied during the times indicated were asbestos-containing since the presence or absence of asbestos in linings is not reflected in the records from which the following data was obtained.

Since the use of the certification codes began in 1967, these drum brake lining segments have used the name "DELCO." The following are color and certification codes for the years indicated:

| <u>SUPPLIER</u>  | <u>COLOR</u> | <u>CERTIFICATION</u> | <u>YEARS</u> |
|------------------|--------------|----------------------|--------------|
| Marshall Eclipse | ?            | None                 | 1949,50      |
| Marshall Eclipse | Blue         | None                 | 1949-53      |
| Marshall Eclipse | Gray         | None                 | 1949-51      |
| Marshall Eclipse | Orange       | None                 | 1951-53      |
| AMCO             | Green        | 501FF                | 1951-65      |
| AMCO             | Green        | 502FF                | 1951-65      |
| ABEX             | White        | 401FF                | 1954-Present |
| ABEX             | Blue         | 408GG                | 1954-61      |
| Marshall Eclipse | ?            |                      | 1955-63      |
| Marshall Eclipse | ?            | 308FF                | 1955-62      |
| ABEX             | Red          | 402GF                | 1958-Present |
| Marshall Eclipse | ?            | 309FF                | 1961-63      |

|        |   |       |              |
|--------|---|-------|--------------|
| Bendix | ? | 310GG | 1963         |
| Bendix | ? | 311FE | 1963         |
| Bendix |   | 301FF | 1964-Present |
| Bendix |   | 302FF | 1964-Present |
| Bendix |   | 327FF | 1970-74      |
| Bendix |   | 324FF | 1970-Present |
| ABEX   |   | 416FF | 1971-81      |
| ABEX   |   | 417FF | 1971-81      |
| Bendix |   | 325FF | 1974-Present |
| Bendix |   | 336FE | 1980         |
| Bendix |   | 337FE | 1980         |

? = Unknown

If used, the date code consists of the last digit of the year and three digits for the day of the year.

Other drum brake lining segments have been purchased from: Bendix (1946-1980), Raybestos-Manhattan (1946-1980) (Certification Code 910-GF for 1971-1975); Unibond (1980-1985); Thermoid Division of H.K. Porter (1974-1980); ITT AMCO (1978-1980); Ferodo (1950s); Multibestos (1950s); Universal Friction (1956-unknown).

- q. GM does not understand what plaintiff is asking for in this subpart.
- r. GM has not maintained samples or exemplars of each item described, but attached are copies of some representative advertising;
- s. In 1975, GM began placing a caution, with language copied from the OSHA regulation, on packages. It read:

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

The word "CAUTION" was in no smaller than 12 point type. The rest of the words were in no smaller than 10 point type. GM specified a minimum size. The caution was changed beginning in 1989 to:

"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 \*"

Starting in 1977, General Motors included this statement in its service manuals:

"Caution: When servicing wheel brake parts, do not create dust by grinding or sanding brake linings or by cleaning wheel brake parts with a dry brush or with compressed air. (A water dampened cloth should be used.) Many wheel brake parts contain asbestos fibers which can become airborne if dust is created during servicing. Breathing dust containing asbestos fibers may cause serious bodily harm."

Starting in 1981, the statement was changed to:

CAUTION: When servicing wheel brake parts, do not create dust by grinding, sanding brake linings, or by cleaning wheel brake parts with a dry brush or with compressed air. Many wheel brake parts contain asbestos fiber which can become airborne if dust is created during servicing. Breathing dust containing asbestos fiber may cause serious bodily harm. A water dampened cloth or water based solution should be used to remove any dust on brake parts. Equipment is commercially available to perform this washing function. These wet methods will prevent asbestos fibers from becoming airborne.

- t. GM's drum brake linings are sold throughout the United States.

#### Disc Brake Linings

- a. Disc Brake Linings;
- b. GM began to manufacture and sell disc brake linings in 1966;
- c. GM stopped manufacturing disc linings containing asbestos in 1985 because of production priorities;
- d. 1985;
- e. See response to subpart e above.
- f. See response to subpart e.

- g. The approximate percentage by weight ranged between 30% to 60%. GM does not know the grade of chrysotile asbestos used in the disc brake linings it purchased;
- h. GM disc brake linings have one or more grades of chrysotile asbestos, generally grades 5, 6 and 7;
- i. Chrysotile for disc brake linings was purchased from:
 

|                                                                 |             |
|-----------------------------------------------------------------|-------------|
| Asbestos Corp., Ltd.                                            | 1967 - 1970 |
| Lake Asbestos                                                   | 1967 - 1970 |
| Canadian Johns-Manville<br>Asbestos, Quebec                     | 1967 - 1984 |
| National Gypsum Co.<br>Cleveland, Ohio                          | 1972        |
| C. L. Zimmerman Co.<br>3655 Central Parkway<br>Cincinnati, Ohio | 1972 - 1977 |
| Union Insulating Co.<br>Parkersburg, W. Virginia                | 1976        |
| Chrysler Chemical Division<br>Trenton, Michigan                 | 1978        |
- j. Disc brake linings segments are a dense grayish or tan material. Typical dimensions are height of 57-63 millimeters, width of 125-142 millimeters, and thickness of 11-13 millimeters;
- k. Service parts were shipped in corrugated boxes sized closely to the size and configuration of the parts. Boxes with the name "Delco" and the colors red and black on white were used beginning in 1958 and later the colors were changed to red and blue on white. Boxes with the name "GM Parts" and the colors black and aqua on white have been used since 1974. Boxes with the name "Goodwrench" and the colors 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.

- q. GM does not understand what plaintiffs are asking for in this subpart;
- r. GM has not maintained samples or exemplars of each item described, but attached are copies of some representative advertising.
- s. See response to subpart s above.
- t. GM's disc brake linings are sold throughout the United States.

INTERROGATORY NO. 4:

Did you claim your asbestos product(s) to be safe, effective and/or easy to handle? If so, identify all documents, which have made such assertions, including, but not limited to, brochures or advertisements (radio, television or printed), and revisions thereof by publication(s) and date. Your asbestos products includes all products which contain any amount of asbestos manufactured, sold, designed, supplied, distributed, relabeled, resold, processed, applied or installed by you or for you by others.

RESPONSE:

See responses to 3, 6, 8, and 11. GM objects to this interrogatory because it is overly broad, vague, and argumentative.

SUPPLEMENTAL RESPONSE:

There are many published articles establishing that mechanics who perform brake and clutch repairs are not injuriously exposed to asbestos and that they do not have any increased risk of disease. GM's asbestos containing brake linings have been in use for over sixty years and they have been advertised separately and as part of the overall motor vehicle during this period. GM has not kept copies of all the advertisement or the details about their publication, but, if plaintiffs are incapable of finding any advertising from this sixty-year period of public dissemination, GM will endeavor to produce copies of some representative advertising.

The list of articles includes the following:

1. Newhouse, M.L., Sullivan, K.R. - "A Mortality Study of Workers Manufacturing Friction Materials: 1941-86." September 19, 1988, British Journal of Industrial Medicine, Volume 49.
2. Moore, L. Lamont - "Asbestos Exposure Associated With Automotive Brake Repair In Pennsylvania." American Industrial Hygiene Association Journal, Volume 49 (1988).
3. Lippmann, Morton - "Asbestos Exposure Indices." Institute of Environmental Medicine, New York University Medical Center, July 18, 1987.
4. Cheng, V.K. I., and O'Kelly, F.J. - "Asbestos Exposure in the Motor Vehicle Repair and Servicing Industry in Hong Kong." J. Soc. Occup. Med., Volume 36 (1986).
5. Schiffman, Mark H., Pickle, Linda., et al. - "Case Control Study of Diet and Mesothelioma in Louisiana." Cancer Research, Volume 48, May 15, 1988.
6. Wong, Otto - "Considerations of Specificity in Assessing The Relationship Between Asbestos and Cancer." American Journal of Industrial Medicine, Volume 23 (1993).
7. Connelly, Roger R., Spirtas, Robert, et al., - "Demographic Patterns for Mesothelioma in the United States." JNCI. Vol. 78, No. 6, June 1987.
8. Rushton, L., Anderson, M.R., and Nagarajah, C.R. - "Epidemiological Survey of Maintenance Workers in London Transport Executive Bus Garages and Chiswick Works." British Journal of Industrial Medicine, Volume 40 (1983).
9. Fischbein, Alf; Rohl, Arthur; Suzuki, Yasunosuke; and Bigman, Oscar - "Interstitial Pulmonary Fibrosis in An Automobile Body Shop Worker." Toxicology Letters, 27 (1985).
10. Gustavsson, Per; Plato, Nils; Lindstrom, Eva-Britta; and Hogstedt, Christer - "Lung Cancer and Exposure to Diesel Exhaust Among Bus Garage Workers." Scand. J. Work Environ Health 1990, Volume 16.
11. Lerchen, Mary L.; Wiggins, Charles L.; and Samet, Jonathan M. - "Lung Cancer and Occupation in New Mexico." JNCI, Vol. 79, No. 4, October, 1987.
12. McDonald, Alison and McDonald, J. Corbett - "Malignant Mesothelioma in North America." Cancer, Volume 46 (1980).

13. Hansen, Eva. M.D. - "Mortality of Auto Mechanics, A Ten-Year Follow-Up." Scand J. Work Environ Health, Volume 15 (1989).
14. Berry, G. and Newhouse, M.L. - "Mortality of Workers Manufacturing Friction Materials Using Asbestos." British Journal of Industrial Medicine, 1983 (Volume 40).
15. Olsen, Jorgen H., and Jensen, Ole M. - "Occupation and Risk of Cancer in Denmark, An Analysis of 93,810 Cancer Cases, 1970-1979." Scand J. Work Environ Health, Volume 13 (1987).
16. Lee, G. L. - "Removing Dusts From Brake Assemblies During Vehicle Servicing - Alternative Cleaning Methods." Ann. Occup. Hygiene, Volume 13 (1970).
17. Hickish, D. E., and Knight, K. L. - "Exposure to Asbestos During Brake Maintenance." Ann. Occup. Hygiene, Volume 13 (1970).
18. Knight, K.L. and Hickish, D. E. - "Investigations Into Alternative Forms of Control for Dust Generated During the Cleaning of Brake Assemblies and Drums." Ann. Occup. Hygiene, Volume 13 (1970).
19. McDonald, A.D.; Harper, A; Arvar, O.A.; and McDonald, J.C. - "Epidemiology of Primary Malignant Mesothelial Tumors in Canada." Cancer, Volume 26 (1970).
20. Oels, H.; Harrison, E. G.; Carr, D., etc. - "Diffuse Malignant Mesothelioma of the Pleura: A Review of 37 Cases." Official Pub. of the American College of Chest Physicians, Volume 60 (1971).
21. Castleman, Berry; Camarota, Lucille A.; Fritsch, Albert J.; Mazzocchi, Sam; and Crawley, Robert G. - "The Hazards of Asbestos for Brake Mechanics." Public Health Reports, Volume 90 (1975).
22. Rohl, A.N.; Langer, A.M.; Klimentidis, R.; Wolff, M.S.; and Selikoff, I.J.; - "Asbestos Content of Dust Encountered in Brake Maintenance and Repair." Proc. Soc. Med., Volume 70 January, 1977.
23. Bruckman, Leonard; Rubino, Robert; and Christine, Barbara - "Asbestos and Mesothelioma Incidence in Connecticut." Journal of the Air Pollution Control Assoc., Volume 27 (1977).
24. Kannerstein, Milton; Churg, Jacob; and McCaughey, Elliott - "Asbestos and Mesothelioma: A Review." Pathology Annual, Part 1, Volume 13 (1978).

25. McDonald, A.D.; Fry, J.S.; Woolley, A.J.; and McDonald, J.C. - "Dust Exposure and Mortality in an American Chrysotile Asbestos Friction Products Plant." *British Journal of Industrial Medicine* 1984, Volume 41.
26. Greenberg, Morris, and Davies, Lloyd - "Mesothelioma Register 1967-1968." *British Journal of Industrial Medicine*, 1974, Volume 31.
27. Lorimer, William V.; Rohl, Arthur N.; Miller, Albert; Nicholson, William I.; and Selikoff, Irving I. - "Asbestos Exposure of Brake Repair Workers in the United States." *The Mount Sinai Journal of Medicine*, Vol. 43, No. 3, May-June 1976.
28. Kjell, Marcus; Jarvholm, Bengt; and Larson, Sven - "Asbestos-Associated Lung Effects in Car Mechanics." *Scand J. Work Environ Health*, Volume 13 (1987).
29. Brisman, J. and Jarvholm, Bengt - "Asbestos Associated Tumors in Car Mechanics." *British Journal of Industrial Medicine*, Volume 45 (1988).
30. Rodelsperger, K.; Jahn, H.; Bruckel, B.; Manke, J.; Paur R.; and Woltowitz, H.- "Asbestos Dust Exposure During Brake Repair." *American Journal of Industrial Medicine*, Volume 10 (1986).
31. Williams, Ronald L. and Muhlbaier, Jean L. - "Asbestos Brake Emissions." *Environmental Research*, Volume 29 (1982).
32. Kauppinen, Timo and Korhonen, Kari - "Exposure to Asbestos During Brake Maintenance of Automotive Vehicles by Different Methods." *American Industrial Hygiene Society*, Volume 48 (1987).
33. Rohl, Arthur N.; Langer, Arthur M.; Wolff, Mary S.; and Weisman, Irving "Asbestos Exposure During Brake Lining Maintenance and Repair." *Environmental Research*, Volume 12 (1976).
34. Lynch, Jeremiah R. - "Brake Lining Decomposition Products." *Air Pollution Control Assn.*, Volume 18 (1986).
35. Enterline, Philip E. and McKiever, Margaret F. - "Differential Mortality from Lung Cancer by Occupation." *J. Occup. Med.* (1963).
36. Newhouse, Muriel L. and Thompson, Hilda - "Mesothelioma of Pleura and Peritoneum Following Exposure to Asbestos in the London Area." *British Journal Industrial Medicine*, Volume 22 (1965).

37. The Annals of Occupational Hygiene, Volume 13, 1970, Papers from the Conference on Exposure to Asbestos During Brake and Clutch Maintenance, held at Ford's Central Office, Brentwood, Essex, England, March, 1969, including:
- a. "Asbestos and Asbestosis." Smither, W.J.
  - b. "Hygiene Standards For Asbestos." Roach, S.A.
  - c. "Exposure to Asbestos During Brake Maintenance." Hickish, D.E., and Knight, K.L.
  - d. "Technical Implementation Of The New Asbestos Regulations." Luxon, S.
  - e. "Possible Alternatives To Asbestos As A Friction Material." Hatch, D.
  - f. "Control of The Use of Asbestos-Containing Friction Materials." Bentley, M.L.
  - g. "Removing Dusts From Brake Assemblies During Vehicle Servicing-Alternative Cleaning Methods." Lee, G.L.
  - h. "Investigations Into Alternative Forms of Control For Dust Generated During The Cleaning of Brake Assemblies and Drums." Knight, K.L., and Hickish, D.E.
38. Jacko, Michael G., DuCharme, Robert T., and Somers, Joseph H. - "Brake and Clutch Emissions Generated During Vehicle Operation." Society of Automotive Engineers, Inc., 1973.
39. Davis, J.M., and Coniam, S.W. - "Experimental Studies on the Effects of Heated Chrysotile and Automobile Brake Lining Dust Injected Into the Body Cavities of Mice." Experimental and Molecular Pathology, Volume 19 (1973).
40. "Asbestos and Brake Linings." Asbestos Information Association, Washington (1976).
41. "Fabrication and Use of Asbestos Friction Materials." Asbestos Information Association, Washington (1976).
42. Brenner, Joseph; Sordillo, Peter; Magill, Gordon; and Golbey, Robert. - "Malignant Mesothelioma of the Pleura." Cancer, Volume 49 (1982).
43. Enterline, Philip E.; and Henderson, Vivian - "Type of Asbestos and Respiratory Cancer in the Asbestos Industry." Arch Environ Health/Volume 27 (1973).
44. Peterson, J.T.; Greenberg, S.D.; and Buffler, P.A. - "Non-Asbestos-Related Malignant Mesothelioma." Cancer, Volume 54.

45. Teta, Mary Jane; Lewinsohn, Hilton C.; Meigs, Wister; Vidone, Romeo; Moward, Linda; and Flannery, John - "Mesothelioma in Connecticut, 1955-1977." Journal of Occupational Medicine, Volume 25 (1983).
46. Weill, Hans; Hughes, Janet and Waggenpack, Carmel - "Influence of Dose and Fiber Type On Respiratory Malignant Risk In Asbestos Cement Manufacturing." American Review of Respiratory Disease, Volume 120 (1979).
47. Wong, Otto - "Chrysotile Asbestos, Mesothelioma and Garage Mechanics." American Journal of Industrial Medicine, Volume 21 (1992).
48. Wong, Otto - "Consideration of Specificity in Assessing the Relationship Between Asbestos and Cancer." American Journal Industrial Medicine, Volume 23 (1992).
49. Wright, W.E.; Sherwin, R.P.; Dickson, Elizabeth A.; Bernstein, L.; Fromm, Janine; and Henderson, B.E. - "Malignant Mesothelioma: Incidence, Asbestos Exposure and Reclassification of Histopathology." British Journal Industrial Medicine, Volume 41 (1992).
50. Plato, Nils; Tornling, Gorna; Hogstedt, Christer, and Krantz, Staffan - "An Index of Past Asbestos Exposure As Applied To Car and Bus Mechanics." British Occupational Hygiene Society, 1995.

To the extent this interrogatory asks for more information or other documents, GM objects because it is overly broad, vague, unduly burdensome and will not lead to admissible evidence. To the extent this interrogatory asks GM to produce copies of all the documents listed, GM objects because the request is unduly burdensome since the articles are equally available to and accessible by plaintiff's lawyers.

INTERROGATORY NO. 13:

Did you perform, direct to be performed, finance, sponsor or receive the results of any studies or tests concerning potential health hazards involved with the use of asbestos containing materials? If so, identify such studies or tests and state:

- a. When, where and at what intervals such studies were performed;
- b. Were such studies in writing or reported at a later date in writing;
- c. Were the results of such studies published or otherwise disseminated? If so, state to whom and when;
- d. Who performed such studies;
- e. What were the results of such studies?

RESPONSE:

GM will produce copies of reports prepared by William H. Krebs about air sampling during brake repairs on December 8 through 11, 1975, at several New York City car dealerships and air sampling performed during brake grinding in 1984, at Pekin Machine and Parts Company. GM will also produce copies of articles authored by Muhlbaier & Williams about emissions from brakes. Otherwise, GM objects to this interrogatory because it is vague, overly broad, argumentative, irrelevant and misleading.

SUPPLEMENTAL RESPONSE:

Copies of the reports William H. Krebs prepared about air sampling during brake repairs and copies of articles Muhlbaier & Williams wrote about emissions from brakes are attached.

INTERROGATORY NO. 17:

During the time that Defendant sold, manufactured, designed, supplied, distributed, mined, milled, relabeled, resold, processed, applied or installed asbestos containing products, did the Defendant ever have any inspectors or anyone from your company or hired by your company whose job it was to go to areas where your asbestos containing products were being used, removed or installed to make a dust level count? If so, state when this procedure started, the purpose of such procedure and the findings and what action, if any, was taken in response to the findings, and attach results.

RESPONSE:

GM had no right to enter workplaces owned and operated by others to inspect and collect air samples and did not do so. GM conducted air sampling to assess whether mechanics were exposed to asbestos while performing brake maintenance and repairs. Copies of the reports will be made available for inspection and copying. Otherwise, GM objects to this interrogatory because it is overly broad, argumentative, and misleading. See also responses to 13 and 14.

SUPPLEMENTAL RESPONSE:

Copies of the reports William H. Krebs prepared about air sampling during brake repairs are attached.

INTERROGATORY NO. 21:

Identify any documents, not currently on file in the Master Asbestos File of Harris County, either received by you from those trade organizations, associations or other entities identified in the preceding interrogatory or else submitted by you to those trade associations, organizations or other entities that relate to any relationship between asbestos exposure and disease.

RESPONSE:

GM objects to this Interrogatory because it is vague, overly broad, burdensome and unlikely to lead to admissible evidence.

SUPPLEMENTAL RESPONSE:

GM assumes that it received copies of the literature published by any organization of which GM was a member. Copies of any publications issued by those organizations of which GM was a member can be obtained from those organizations. GM's many facilities in the United States have or have had many formal and informal libraries and those libraries have received thousands of periodicals. There is no central listing or catalog file for all these libraries or collections that GM (or anyone else) could review in order to respond to this interrogatory. GM objects to this interrogatory because it asks for information that is not relevant and will not lead to admissible evidence. It is also overly broad, burdensome, harassing and oppressive.

INTERROGATORY NO. 25:

Identify each and every magazine or trade publication in which answering Defendant advertised its asbestos products from 1950 until the time you ceased mining, milling, selling, distributing, and/or applying asbestos containing products.

RESPONSE

See response to 3(r). GM will make samples of advertising available for inspection and copying, but does not have the information requested for 1950 to the present. GM objects to this interrogatory because it is overly broad, burdensome and unlikely to lead to admissible evidence.

SUPPLEMENTAL RESPONSE:

Copies of representative advertisements are attached.

INTERROGATORY NO. 28:

State whether or not you have any information as to your relative market share regarding each of your asbestos containing products. If so, as to each year between 1940 or the time that you began mining, milling, selling, distributing and/or applying asbestos containing products until cessation of same, and with respect to each type of product, provide such information or opinion as to your market share and identify each document which provides any information to assist you in this determination. Give the same answers as to asbestos containing products in the Texas Gulf Coast area.

RESPONSE:

General Motors does not understand what plaintiffs mean by their use of the term "market" and cannot answer this interrogatory. General Motors objects to this interrogatory because it is vague, ambiguous, unintelligible and overly broad in time and scope. It also asks for information that is not likely to lead to admissible evidence.

SUPPLEMENTAL RESPONSE:

GM cannot identify "each and every entity" to which it supplied any asbestos-containing friction products in the region during the fifty-five year period requested by this interrogatory. GM sells its motor vehicle and replacement parts to authorized dealerships and distributors. GM does not keep records that would allow it to determine the amount of asbestos-containing friction products it sold in the region, or to make any other geographic or chronological categorization. For the lengthy and historic period covered by this interrogatory, GM supplied replacement parts,

which may have included some asbestos-containing friction products, to authorized dealerships and distributors in existence in the region during the relevant period.

Invoices that the Warehousing and Distribution Division of General Motors maintains reflect the sales of replacement parts to GM dealers and warehouse-distributors in the Defined Geographical Area, if any. The normal retention period for these invoices is six years. These invoices are maintained in Flint, Michigan, in chronological order. Approximately 13,000 invoices are prepared daily. Other invoices are normally maintained for six years at Detroit Diesel Allison Division in Detroit, Michigan, and Indianapolis, Indiana. GM will make these records available for inspection where they are maintained in the usual course of business.

Sales of individual parts to dealers, warehouse distributors, and national accounts are recorded in invoices that General Motors service parts operations currently maintain. Over 18 million invoices are now stored on microfilm covering world-wide sales of over 356,000 different parts carried in the General Motors service parts operations distribution system. In addition, invoices concerning sales to distributors and original equipment manufacturers are also currently available for this same period at the Detroit Diesel Allison facilities related to automatic transmissions used on medium and heavy duty trucks and on coaches. All invoices at these locations are retained by invoice number in processing sequence and not by geographical location or customer. They are not otherwise indexed or summarized.

To obtain the information this interrogatory asks for, every part number for asbestos-containing parts would have to be identified from engineering drawings. Then, each customer's monthly statement would have to be reviewed to obtain all invoice numbers. Finally, the individual invoices would have to be found from microfilm records using equipment that is

otherwise employed in General Motors routine business operations and a comparison made between the part numbers on the invoices and those part numbers identified for asbestos-containing parts.

For the years 1956 through 1985, GM has voluminous records that identify AC-Delco warehouse distributor accounts for each year. The records for any one year are approximately 4 to 6 inches thick. The records are not indexed by city, county or state and there are approximately 45 identified accounts per page within each year's 4-6 inch volume of records. These AC-Delco consolidated distribution records contain hundreds of thousands of pieces of information for the period covered by this interrogatory. These records do not distinguish between asbestos-containing parts and the numerous parts that do not contain asbestos. Thus, none of the data is specific to particular parts or components like asbestos-containing friction products. There is no comparable summary or index of sales to authorized GM dealers.

GM will make available for plaintiff's inspection, at the location where the records are kept, at a time convenient to all, the information it has about distributors that is partially responsive to this interrogatory.

For GM to identify the names of authorized dealerships and distributors in The Geographic Region during the thirty (30) year period from 1955 to 1985 would be an incredibly time-consuming task the result of which would not be commensurate with the effort involved. GM cannot identify dealerships unless they are currently in operation because it does not track or keep a database on closed dealerships. However, if plaintiff provides the name and location of a particular dealer and approximate date(s) of operation, GM will try to determine if such an entity existed as an authorized dealership. Information about GM authorized dealerships is not

indexed by the "county" where they might be doing business. In addition, GM's information about authorized dealerships and distributors does not provide data specific to sales of asbestos-containing friction products as defined in this interrogatory.

**INTERROGATORY NO. 32:**

Based upon the contents of your products, the method of manufacturing and the method of application, could or can your products be generally applied or removed without liberating asbestos fibers? Your answer may be limited to those asbestos-containing products that have been identified in any Harris County asbestos case.

- a. If there is a different answer concerning different products manufactured, sold, distributed, or used by your company then specify the different products by manufacturer's name and popular name.
- b. If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are referring to and the specific products you are referring to and the year involved.
- c. If there is a difference in your answer depending on the trade or type worker, then specify which type workers you are referring to.

**RESPONSE:**

Air sampling, both by GM and others, shows that mechanics are not excessively exposed to asbestos while installing or removing brake linings.

**SUPPLEMENTAL RESPONSE:**

Yes. The chrysotile asbestos in GM's brake linings and clutches is encapsulated in a solid resin matrix. During use, almost all of the asbestos fibers (reported to be more than 99% by weight) in the residual dust are transformed into a non-asbestos material, reported by some to be

forsterite. Furthermore, most brake wear debris is removed from the brake drum by the fan motion of the wheels during vehicle operation. Reliable studies have shown that the debris present in the drums at the time of brake service work contains less than 1% free asbestos, by weight. Moreover, any asbestos fibers that are found in the brake wear debris are predominantly submicroscopic. In addition, GM does not know of any study that establishes that mechanics who perform brake or clutch repair are excessively exposed to asbestos and have an increased risk of disease. GM objects to this interrogatory because it is overly broad, vague, unduly burdensome and will not lead to admissible evidence.

INTERROGATORY NO. 35:

If you have pled that the Plaintiff misused Defendant's asbestos containing products, then state in what manner the defendant contends that Plaintiff misused its products? If "yes," then state in what manner and under what circumstances each product was misused. Also state what Plaintiff could have done to avoid such misuse.

RESPONSE:

This interrogatory has not been propounded in a specific case and GM's investigation and discovery are not completed. Therefore, it cannot respond to this interrogatory.

SUPPLEMENTAL RESPONSE:

GM's recommendations for maintaining and servicing brake linings and transmission clutches are contained in numerous service manuals. Copies of relevant excerpts from the following representative service manuals will be made available for inspection at the office of GM's lawyers.

| <u>Year</u> |                                                                         |
|-------------|-------------------------------------------------------------------------|
| 1930        | Chevrolet Repair Manual, Series AC-LQ, AD-LR                            |
| 1930        | Pontiac Six Motor Cars - Instructions, Care and Operation               |
| 1931        | Oldsmobile Shop Manual (Microfiche)                                     |
| 1933        | Buick Motor Company, Shop Manual                                        |
| 1936        | Buick Motor Company, Shop Manual                                        |
| 1937        | GM Truck & Coach Maintenance Manual, Models T-46 and F-46 Truck Chassis |
| 1937        | GMC Maintenance Manual - Light Duty Trucks                              |
| 1940        | GMC Maintenance Manual - Transmission Series 100 to 250                 |
| 1940        | GMC Maintenance Manual - Heavy Duty Trucks                              |
| 1940        | Buick Motor Division, Shop Manual                                       |
| 1940        | Oldsmobile Shop Manual (Microfiche)                                     |
| 1940        | Pontiac Shop Manual                                                     |
| 1946        | Buick Shop Manual                                                       |
| 1948-1953   | Pontiac, Hydra-Matic Shop Manual                                        |
| 1949-1950   | Pontiac Shop Manual                                                     |
| 1950        | GMC Maintenance Manual - Heavy Duty Trucks (Brakes)                     |
| 1950        | GMC Maintenance Manual - Heavy Duty Trucks (Clutch)                     |
| 1950        | GMC Maintenance Manual - Models 400-470 Light Duty Trucks               |
| 1950        | GMC Maintenance Manual - Models 400-470 (Transmissions)                 |
| 1950        | Buick Manual                                                            |
| 1950 & 51   | Oldsmobile Shop Manual (Microfiche)                                     |

|      |                                                                                            |
|------|--------------------------------------------------------------------------------------------|
| 1955 | Buick Shop Manual                                                                          |
| 1960 | Buick Chassis Service Manual                                                               |
| 1960 | Oldsmobile Service Manual                                                                  |
| 1960 | Pontiac, Hydra-Matic Shop Manual                                                           |
| 1960 | Pontiac, Chassis Shop Manual                                                               |
| 1960 | Pontiac, Chassis Shop Manual                                                               |
| 1960 | GMC Maintenance Manual - Light Duty Trucks                                                 |
| 1960 | GMC Maintenance Manual - Heavy Duty Trucks                                                 |
| 1960 | GMC Trucks Maintenance Manual (Models 1000-5000)                                           |
| 1960 | GMC Trucks Maintenance Manual (Models 1000-5000)                                           |
| 1960 | GMC Maintenance Manual - Heavy Duty Trucks                                                 |
| 1963 | GMC Maintenance Manual - Coach Models SDH-SDM, 4502, 5302, TDH-TDM, 4518, 4519, 5303, 5304 |
| 1965 | Buick Service Manual - Skylark Grand Sport, All Models (Reprinted 4/63, 3/66, 5/69, 2/71)  |
| 1970 | Buick Chassis Service Manual, All Series                                                   |
| 1970 | Oldsmobile Chassis Manual (Microfiche)                                                     |
| 1970 | GMC Maintenance Manual - Light Duty Trucks                                                 |
| 1970 | GMC Service Manual - Heavy Duty Trucks                                                     |
| 1970 | GMC Truck Service Manual Supplement, Series 1500 thru 3500                                 |
| 1970 | GMC Truck Service Manual Series 7500 thru 9502                                             |
| 1970 | Pontiac Service Manual                                                                     |
| 1975 | Buick Chassis Service Manual, All Series                                                   |

|      |                                                                                                      |
|------|------------------------------------------------------------------------------------------------------|
| 1976 | Small Car Brake Service Manual                                                                       |
| 1977 | Truck Service Manual - Light Duty Trucks, Series 1500 thru 3500 (includes Jimmy, "G" and "P" models) |
| 1977 | Service Manual - Series 70 thru 9502                                                                 |
| 1977 | Truck Service Manual, All Models 4500 thru 6500                                                      |
| 1977 | Chevrolet Medium Duty Truck Service Manual                                                           |
| 1977 | Oldsmobile Service Manual - All Series                                                               |
| 1978 | Pontiac Service Manual                                                                               |
| 1979 | Delco - Four Piston Disc Brake Service Manual                                                        |
| 1980 | Buick Chassis Service Manual, All Series Except Skylark                                              |
| 1980 | GMC Heavy Duty Trucks                                                                                |
| 1980 | GMC Light Duty Trucks                                                                                |
| 1980 | GMC Heavy Duty Trucks (Air Brakes)                                                                   |
| 1980 | GMC Light Duty Trucks                                                                                |
| 1980 | GMC Truck Service Manual - Heavy Duty Models                                                         |
| 1980 | GMC Unit Repair Manual - Light Duty Trucks                                                           |
| 1980 | Pontiac Service Manual Supplement (All series except Phoenix)                                        |
| 1980 | Pontiac Phoenix Service Manual                                                                       |
| 1980 | Oldsmobile Chassis Service Manual - Starfire, Cutlass, Eighty-Eight Ninety Eight, Toronado           |
| 1981 | Drum Brake Service Manual - American Passenger Cars                                                  |

1983        Automatic Transmission -  
              Models T70204  
                  T70604  
                  T80204  
                  C-8323  
                  T80604

1983        Brake Maintenance - Section 5  
              Models T70204  
                  T70604  
                  T80204  
                  T80604  
                  C8323

1984        Delco - Single Piston Disc Brake Service Manual

1985        Buick Chassis Service Manual, Volume 1

1985        Oldsmobile Chassis Service Manual - Cutlass Supreme, Delta 88 Royale, Custom  
              Cruiser, Toronado

1985        Oldsmobile Chassis Service Manual, Volume 1 - Firenza, Calais, Cutlass Ciera,  
              Ninety-Eight

1985        Oldsmobile Chassis Service Manual, Volume 2 - Firenza, Calais, Cutlass Ciera,  
              Ninety-Eight

1985        Pontiac Firebird Service Manual

Service Manual Brakes - Model TH-8201  
 Automatic Transmission - Model TH-8201  
 Automatic Transmission, Allison V 730 D Series  
 SD40-2 Locomotive Service Manual  
 Model 645E3B Engine Maintenance Manual

GM objects to this interrogatory because it is vague and ambiguous with respect to the  
 term "misused" and also because it is overly broad, unduly burdensome and oppressive.

INTERROGATORY NO. 38:

Up until the time that you ceased to sell and/or manufacture asbestos containing products, had the defendant ever conducted or caused to be conducted any studies designed to minimize or eliminate the inhalation of asbestos dust or fibers by those exposed to the use of the defendant's asbestos containing products? If so, give the following:

- a. Name of the person or firm conducting such studies;
- b. The date the studies began and the date completed;
- c. Any publication or dissemination of the results of the studies;
- d. The nature of any action to eliminate or minimize inhalation of asbestos dust or fibers;
- e. Attach copies.

RESPONSE:

GM has studied devices designed to minimize the potential for exposure to asbestos during brake repairs. Copies of reports will be made available for inspection and copying.

SUPPLEMENTAL RESPONSE:

Attached is a copy of William H. Krebs' June 17, 1974, letter to the Resident Manager at the GMC Truck & Coach Division about the evaluation of a Portable Brake Assembly Washer.

INTERROGATORY NO. 43:

Does the Defendant possess or have in its control any written documents and/or written materials prior to 1980 which indicate that other manufacturers of asbestos containing products had any knowledge, information, or understanding that asbestos would, could, or might be harmful? If so, list each document and/or written material, and attach a copy.

RESPONSE:

GM objects to this Interrogatory because it is overly broad, unduly burdensome, argumentative and unlikely to lead to admissible evidence.

SUPPLEMENTAL RESPONSE:

GM has no reasonable or practical way to determine what specific documents or written materials of the type described in the interrogatory any of the hundreds of thousands of its former and present employees may have received. GM does not have a central listing that records "written documents and/or written materials" between its employees and employees of other companies. GM objects to this interrogatory because it is overly broad, vague, unduly burdensome and will not lead to admissible evidence.

Respectfully submitted,

THOMPSON & KNIGHT,  
A Professional Corporation

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ATTORNEYS FOR DEFENDANTS  
ALLIEDSIGNAL INC. AND  
GENERAL MOTORS CORPORATION

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that on the 9 day of June, 1998, a true and correct copy of the foregoing document was forwarded to counsel for Plaintiff, Russell L. Cook, Jr., Cook, Butler & Doyle, L.L.P., 1221 Lamar, Suite 1300, Houston, Texas 77010-3038, via certified mail, return receipt requested and to all other known counsel of record via first class mail.

*Dawn M. Wright*  
Dawn M. Wright

## VERIFICATION

STATE OF MICHIGAN )  
 ) SS  
COUNTY OF WAYNE )

**THERESA CERWIN**, says that she is authorized by General Motors Corporation under applicable law and rules to verify and does verify these SUPPLEMENTAL RESPONSES OF DEFENDANT GENERAL MOTORS CORPORATION TO PLAINTIFFS' INTERROGATORIES on behalf of General Motors.

Theresa Cser

THERESA CERWIN  
Authorized Agent

Subscribed and sworn to before me  
this 13th day of May, 1998.

Marguerite E. Chan  
Notary Public

MARGUERITE L. FOLIN  
Notary Public, State of Michigan  
Acting Notary Public  
My Commission Expires 12/31/2012