

Texas. GM has been authorized to do business in Texas since December 12, 1941.

- 3. Has Defendant or any of its predecessor or subsidiary companies at any time engaged in the mining and subsequent sale of material containing asbestos fibers? If so, identify the location of the mine(s), the years of its operation, the type of asbestos mined and whether you sold any asbestos to any Defendants in the Bexar County asbestos litigation.**

ANSWER:

Defendant objects to Interrogatory No. 3 because it is vague, ambiguous and indefinite to the extent it fails to define "predecessor." Further, it calls for a legal conclusion without setting forth a factual basis or a foundation for such an opinion. Moreover, the interrogatory is overly broad, general and global to the extent it is not limited in time or to the products at issue in this case. In this regard, the interrogatory improperly seeks information which is neither relevant nor material to any issue in this case and is not reasonably calculated to lead to the discovery of admissible evidence at the trial of this lawsuit. Subject to and without waiving the foregoing objections, Defendant has never mined or sold asbestos.

- 4. Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time manufactured or sold.**

ANSWER:

Defendant objects to Interrogatory No. 4 because it is vague, ambiguous and indefinite to the extent it fails to define "predecessor." Further, it calls for a legal conclusion regarding what companies are "predecessors" without setting forth a factual basis or a foundation for such an opinion. The interrogatory 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. Moreover, the interrogatory is overly broad, general and global to the extent it fails to limit its application to GM as does Plaintiffs' petition to those automotive friction materials manufactured and sold by GM. Further, the interrogatory is not limited in time. Subject to and without waiving the foregoing objections, Defendant has manufactured and sold disc and drum brake linings and automatic transmission bands and vehicles incorporating those items. GM also sold and distributed clutch plates and bands for automatic and