product, investigative and third-party communication privileges set forth in Rule 166b of the Texas Rules of Civil Procedure. Subject to and without waiving the foregoing objections, mesothelioma is found in persons who have had prolonged, excessive exposure to respirable amphibole asbestos fibers and in persons with no history or indications of asbestos exposure. GM is not aware of a cure for mesothelioma. GM cannot determine when any of its hundreds of thousands of current or past employees first heard of these "consequences or effects." However, to the best of GM's knowledge, there is no recognized, scientific substantiation that brake linings create an increased risk of illness to consumers or people who do repairs.

29. As to gastro-intestinal cancer, laryngeal cancer, pharyngeal cancer or lymphatic cancer, state:

(a) The type of cancer and the date on which Defendant or its subsidiary or predecessor first learned that such diseases were caused by inhalation of asbestos fibers by humans.

(b) What cancers has the Defendant or its subsidiary or predecessor become aware can be caused by exposure to asbestos fibers?

(c) The date on which Defendant first suspected other cancers were caused by asbestos inhalation.

(d) Who within the company or its subsidiary or predecessor first discovered the adverse consequences or effects of the asbestos exposure.

(e) What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

(f) Whether any such information is still maintained by Defendants or its subsidiaries or predecessors in a written form.

(g) Who is the custodian of such information.

ANSWER:

Defendant objects to Interrogatory No. 29 to the extent it refers to and inquires of a "predecessor" without identifying such or providing a definition of such. Further, for Defendant to identify a predecessor would involve a legal