

ANSWER:

Defendant objects to Interrogatory No. 18 to the extent it is ambiguous by inquiring of "only physicians and/or hygienists" but then stating "including but not limited to, physicians and industrial hygienists." Moreover, the interrogatory is overly broad, general and global to the extent it seeks information over a span of 40 years and includes persons who "may have had" knowledge. Further, the interrogatory seeks to impose an undue burden upon Defendant by requiring it to compile a list which is not kept in the ordinary course of business and which would require unnecessary and burdensome amount of time, expense and manpower. Finally, the interrogatory 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 states as follows:

The corporate medical directors of GM were:

Clarence Selby, M.D.	(1935-1949)
Max Burnell, M.D.	(1949-1958)
S.D. Steiner, M.D.	(1958-1976)
R.G. Wieneck, M.D.	(1976-1980)
R.W. Prior, M.D.	(1980-1988)
B.B. Van Brocklin, M.D.	(1988-present)

The directors of the GM Industrial Hygiene Department were:

L.B. Case	(1936-1945)
F.A. Patty	(1945-1960)
V.J. Castrop	(1960-1975)
G.L. Kortsha	(1976-1989)
W.H. Krebs	(1990-1993)

19. Does Defendant have in its possession any books, pamphlets, memoranda, or written materials of any kind or character that would indicate that asbestos fibers, when inhaled, can be hazardous to the health of human beings? If so, state:

(a) The name of each such publication.