

given by said experts, in accordance with Tex. R. Civ. P. 166b(2) (e) (West 1994).

ANSWER: Not applicable. See response to No. 2.

4. Identify all past and present divisions, subsidiaries or affiliated companies of defendant, which now, or at any time in the past, are/were engaged in any phase of manufacturing, sale, supply, purchase, application, installation, relabeling, processing or distribution of any vehicle components/parts, which contained asbestos, including by way of illustration but not limited to: brake friction products, brake linings, gaskets, pads and clutch facings, and set forth with particularity the precise relationship between such entity and defendant and the dates of such relationship(s), and identify the nature and extent of such functions during the years 1949 to the present.

ANSWER: GM understands that plaintiff claims to have been exposed in the United States to asbestos from brake linings and its response to this interrogatory concerns those products. Asbestos-containing drum brake linings were manufactured by the Inland Division (later Delco Products and Delco Chassis Division) from 1939 to present. Asbestos-containing disc brake linings were manufactured by the Delco Moraine Division from 1966 to 1985. Brake linings were distributed by United Motors (before 1930 to 1961), United Delco (1961-1974), AC Delco (1974 to present), Delco Moraine (1942-present), GM Parts (before 1969 to present) and before 1969 by Buick, Cadillac, Chevrolet, GMC Truck, Oldsmobile, and Pontiac.

5. List by brand name all of DEFENDANT's asbestos-containing products. DEFENDANT's asbestos-containing products includes all products which contain any amount of asbestos manufactured, sold, designed, supplied, distributed, relabeled, resold, processed, applied or installed by, or for, DEFENDANT. "By or for" is meant to refer to Defendant, to all Defendant's predecessors in interest, (whether by purchase, merger, consolidation or otherwise), to all of defendant's subsidiaries, divisions, joint ventures or affiliates. As to each product, state the following:

- a. type of product (e.g., brake friction products, brake linings, gaskets, pads, clutch facings, 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;