

RESPONSE: GM does not have an exemplar of each brake lining that was used in all models of automobiles manufactured during the 1950s and 1960s. Asbestos-containing drum brake linings that can be purchased from a GM dealer today are not much different in design or appearance. GM also objects to this Request because it is vague, overly broad and unduly burdensome, and it asks for items that are neither relevant nor likely to lead to admissible evidence.

27. An exemplar of each type of the asbestos-containing gaskets used by DEFENDANT in automobiles and trucks manufactured for sale in the United States during the 1950s and 1960s.

RESPONSE: GM does not have an exemplar of each asbestos-containing gasket used in automobiles and trucks during the 1950s and 1960s. If GM still supplies any of these parts, they can be purchased through a GM dealer. GM also objects to this Request because it is vague, overly broad and unduly burdensome, and it asks for items which are neither relevant nor likely to lead to admissible evidence.

28. An exemplar of each type of asbestos-containing clutch facings used by DEFENDANT in automobiles and trucks manufactured for sale in the United States during the 1950s and 1960s.

RESPONSE: GM does not have an exemplar of each asbestos-containing clutch used in automobiles and trucks during the 1950s and 1960s. If GM still supplies any of these parts, they can be purchased through a GM dealer. GM also objects to this Request because it is vague, overly broad and unduly burdensome, and it asks for items which are neither relevant nor likely to lead to admissible evidence.

29. All corporate committee records referencing the safety of asbestos-containing products used in the manufacture of vehicles for sale in the United States.

RESPONSE: GM objects to this Request because it is vague, overly broad, and unduly burdensome.

30. All corporate committee records referencing efforts to phase out the use of asbestos in vehicles manufactured for sale in the United States, or to find asbestos-free replacements for use in such vehicles.

RESPONSE: The chemical composition or formulation of brake linings and disc pads have changed over the past sixty years for many reasons, including changes in the design of cars and trucks and their brake systems, changes in manufacturing methods, and different requirements for performance, durability, use, etc. GM has not made or sold "asbestos-free replacements" for asbestos brake linings, since brake lining material not containing asbestos has different performance characteristics and is used in brake systems that are designed to accommodate its performance characteristics. Also mechanics are not excessively exposed to asbestos from routine brake maintenance or