

GM's operations have nothing to do with the manufacture or distribution of asbestos-containing products. Also, the number of possible documents that may be responsive to this request is unknown to GM, as is the extent to which such possible responsive documents covering the past 78 years have been retained. Because of this, GM objects to this request since it is overly broad, burdensome and oppressive in scope, both as to time and subject, and is not reasonably calculated to lead to the discovery of admissible evidence. GM also objects that this request is vague and ambiguous as to what is meant by records "indicating, stating, or detailing the existence of" any subsidiary, predecessor or division as those terms are defined by plaintiff in his preface to this request.

REQUEST FOR PRODUCTION NO. 3:

Please produce copies of all reports of Defendants' experts and any and all documents relied upon by such experts.

RESPONSE:

GM has not retained any experts or received any reports of the nature described by plaintiff. GM also objects to this request because it is vague, overly broad, unduly burdensome, and unlikely to lead to admissible evidence.

REQUEST FOR PRODUCTION NO. 3:

Please provide a copy of all documents and other materials and reports identified in Answer to Interrogatory No. 60(d), other than Depositions and Medical History provided by Plaintiff.