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1 on some water pumps. 2 Q. You mentioned distribution centers. What 3 distribution -- what locations do you remember 4 these distribution centers; do you remember where 5 they were located throughout the country? 6 A. For GAP? 7 Q. Well, the NAPA, you mentioned NAPA distribution 8 centers or the distribution centers that had the 9 products. 10 MR. RILEY: Over what time frame? 11 Q. (BY MR. ABBOT) Let's go from 1966 when you started 12 to 1980. 13 A. All right, GAP supplied approximately 14 to 17. 14 Q. 14 to 17 distribution centers? 15 A. Yes. 16 Q. Who owned those distribution centers? 17 A. Part of them were owned by Genuine Automotive Parts 18 and some of were owned by I think the Boltons owned 19 Des Moines and Dewitt. I guess the rest of them 20 were GAP. Only those two were probably Bolton. 21 Q. Could you, just based on your recollection, today 22 let me know, identify for me, where those 23 distribution centers were located? 24 A. Dallas, Houston, San Antonio, Kansas City, St. 25 Louis, Mount Vernon, Milwaukee, Stevens Point,	1 Industries, were you involved in the purchasing at 2 all? 3 A. Purchasing? 4 Q. Yes. 5 A. No, not at that time. 6 Q. And what year did you get involved with the 7 purchasing of product? 8 A. Somewhere around '69, maybe '68, '69, some 9 purchasing. 10 Q. Okay. What sort of purchasing were you involved 11 then? 12 A. Once the plant manager took over as general manager 13 of the two plants, I would help out sometime if we 14 were -- say someone was off on vacation or out sick 15 or something, I would help out on purchasing. I 16 talked with some of the people, I ordered some 17 brake lining. 18 Q. You ordered all different type of products, isn't 19 that correct? 20 A. Ordered American Brakebloc. 21 Q. No, I'm just talking, beyond that, all sorts of 22 products from American Brakebloc? 23 A. Sure. I was not a purchasing person. I just 24 filled in. 25 MR. ABBOT: That's all the questions I
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1 Indianapolis, Grand Rapids, Detroit, Fort Wayne, 2 Louisville, Knoxville, and Nashville. I left out 3 two, Des Moines and Dewitt. 4 MR. DICKEY: You didn't mean Mount Vernon, 5 Virginia, did you? 6 THE WITNESS: No. 7 Q. (BY MR. ABBOT) Of the distribution centers you 8 mentioned, were there any distribution centers 9 you're aware of that are on the east coast? These 10 all seem to be in the middle of the United States. 11 A. Central United States. None on the east coast. 12 Q. None on the east coast? 13 A. No. 14 Q. What about the west coast? 15 A. No, sir. 16 Q. And, the follow-up on that, you would have no 17 knowledge of the distribution centers in the east 18 coast or who they were buying products from, what 19 they were supplying NAPA stores with on the east or 20 west coast? 21 A. It was always my knowledge what I was told, if they 22 were NAPA, they were buying American Brakebloc. 23 Q. Give me one second. Let me check my notes for a 24 second. 25 In 1966 when you started with Genaut	1 have, thank you. 2 MR. DICKEY: I don't have any questions. 3 Do you have anything, Pat? 4 EXAMINATION 5 BY MR. RILEY: 6 Q. I just want to clarify one point. Before the late 7 1980's, if somebody went into a NAPA store and got 8 a box of either brake linings or brake shoes or 9 disk brakes that had the NAPA logo on the box, 10 whose friction product would be inside that box? 11 A. To my understanding, it would be Abex. 12 Q. Okay. 13 EXAMINATION 14 BY MR. ABBOT: 15 Q. And the basis of your understanding even at that 16 late time in the late 1980's -- 17 MR. RILEY: I said before the late 1980's. 18 Q. (BY MR. ABBOT), I'm sorry, in that time frame that 19 Mr. Riley was referencing, the basis of your 20 knowledge for that statement is what? 21 A. Sometimes I went to these DC's and I could see the 22 product. 23 Q. Did you ever see -- 24 A. It had American Brakebloc on the labels. Our B, 25 our RS. AB's all those back in that period of time