Page 82

testing semi-metallic product at that time?
A. Because the original manufacturers were switching over to semi-metallic friction material on the disc pads.
Q. Are there any documents that are produced in connection with your testing of those products?
A. No.
Q. Your people who drive the cars don't fill out forms or don't have surveys about what they liked or didn't like about the products?
A. No. That was done by Abex themselves in their testing.
Q. I'm sorry. They did it themselves?
MR. RILEY: You said Bendix.
THE WITNESS: Excuse me. Well, I cannot speak for Bendix.
Q. (By Mr. Dumler) Okay. I'm asking about Genuine Parts. When it tested a brake product, did it have its people fill out any forms or do any surveys or any other documents related to the testing of that product?
A. No.
Q. So were you involved at all in the testing of the semi-metallic products?
A. Yes.

Page 83

Q. Were you the person responsible for whether or not semi-metallic products would be sold by Genuine Parts?
A. Yes.
Q. And were you the person responsible for having the employees at Genuine Parts test the semi-metallic products?
A. Yes.
Q. All right. So this work, basically you sent them out and then spoke to the people who drove the cars --
A. Yes.
Q. -- and got feedback from them about whether or not they were good, bad, or otherwise?
A. Yes, and personally had them on cars.
Q. When did you make the determination that the semi-metallic product was a product that Genuine Parts wanted to start selling?
A. When?
Q. Correct.
A. Like year?
Q. Correct.
A. I don't recall the exact year, but it would have been in the '70s.
Q. Early '70s?

Page 84

A. Yes. It wouldn't have taken that long to run the test.
Q. And are you the person that was responsible for approving Genuine Parts' sale of semi-metallic in the '70s?
A. Yes.
Q. What was the advantage of semi-metallic over your asbestos-containing products that you were selling at the time?
A. Strictly heat. They could take higher temperatures without breaking down.
Q. Were there any disadvantages to the semi-metallic versus the asbestos-containing brake products you were selling in the early '70s?
A. Yes.
Q. What were they?
A. It would eat up your rotors and, in some cases, would require additional pedal pressure to get the car to stop.
Q. Were there any other disadvantages?
A. Noise, morning sickness.
MR. RILEY: What?
THE WITNESS: Morning sickness. That's -- see, semi-mets work better at elevated temperatures.

Page 85

At normal temperatures, the coefficient of friction is lower, whereas an asbestos product has its coefficient of friction stable basically through all ranges of temperature before you reach primary fade.
So you would have to press -- you're backing out of your driveway in the morning, and you hit your brakes. And if you had asbestos on there, you know, you would stop.
And now you put the semi-mets on there and say, wait, it's not going to stop. And you pressed harder to get it to, and it would stop.
Q. (By Mr. Dumler) So semi-metallics were not as attractive to the consumer as the asbestos products?
A. It really wasn't being -- I couldn't speak from the consumer. I'm speaking from a point of a functionality and a required material to be a safe material.
So disregarding the morning sickness problems or the squealing and noise, we wanted to produce a safe product.
And that's what original equipment says belongs on the car. That's what we're going to put back on there.
Q. What was the reason that Rayloc did not go to