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Q When you say OEM, you are referring to original equipment manufacturer?
A Truck manufacturer or trailer.
Q Then the fleet would be the actual entity using the truck?
A Yes.
Q It is my understanding when an OEM, obviously you will correct me if I'm wrong, it is my understanding that Eaton would provide the axles to the OEM for the OEM to actually manufacture the truck; is that correct?
A That's correct.
Q Were you familiar at all during the 1980-'83 time frame with who the OEMs were that Eaton did regular business with?
A Yes.
Q How did Eaton conduct business with the OEMs? Did they enter into contracts, was it catch as catch can?
ALL COUNSEL: Objection to the form.
Q If you understand, you can answer.
A Generally, the truck manufacturer would decide to engineer our product into their vehicle. And they would then enter that product into their sales data books and make it available to their customers and basically our competition did the same thing.
Through that period of time, I don't think

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there were really any direct contracts as far as supply contracts in that, during that era. It sort of evolved later on where there were more supply contracts developed.
Q As I understand it, a truck OEM would decide, make some decision based on performance or other issues to take your product and put it into their truck or spec it into their truck?
A That's correct. And it also had to do with customer or fleet specifications and preferences.
Q And what you would do, they would come to you and say we are going to make this truck and we want your axle and here is what we want in our axle?
A That is correct.
Q You would then try to meet their specifications, you would manufacture the axles and then send them to the OEM to allow them to then place them into their product?
A That's correct.
Q At that time during the 1980-'83 time frame, do you recall the names of any of the OEMs that used Eaton axles?
A Yes.
Q Could you name them for me.
A Ford Motor Company, International Harvester, Kenworth, Peterbilt, Mack, Freightliner, Crane Carrier, I'm trying to think of who was still around, I don't know whether Brockway was still in existence then or not, White Motor.

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Q Now, I understand obviously there is different sizes of trucks. The OEM, the Ford that you just mentioned, from '80 to '83, do you recall what size trucks Ford was manufacturing with Eaton axles?
A Everything from class six up to class eight.
Q Class eight being the heaviest truck?
A Yes.
Q How about International?
A The same.
Q How about Freightliner?
A Primarily class eight at that time.
Q Of the group that you have just mentioned, who was the largest most significant OEM for Eaton during this time frame 1980 to 1983?
A I would say overall probably between Ford and International. I left out GMC at that time too. They were also in there, GMC and Chevrolet. They were fairly large too.
Q So Ford and International and GMC were the largest OEMs that Eaton did business with during the 1980 to 1983 time frame?
A Yes.
Q During 1980 to 1983, are you familiar with where Eaton obtained its brake linings from?
A Yes.
Q Can you tell me whose brake linings Eaton used

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during this time frame, 1980 to 1983?
A I would say primarily Abex and Carlisle.
Q Were there others during this time frame?
A There were small special orders. I think Raybestos was in there and maybe New Turn.
Q You described these as special orders so they weren't generally ones being used by Eaton during this time frame?
A Probably they were more special orders where a customer said I want that particular type of lining.
Q I want to stop for a second and ask you to look at these documents I have given you previously, Hobbie Exhibits 2, 3 and 4. I have some general preliminarily questions. I won't get into anything substantively right now.
Do you recognize Hobbie Exhibit 2?
A Yes.
Q Can you just generally describe what it is?
A It was a request made to me by the then – this is 1987 -- the axle brake division to help them determine where some fleet customers would be interested in testing or basically applying nonasbestos-type linings and operating them in their fleets.
Q My first question is, does that form look familiar to you?
A Yes.

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