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1 A p p e a r a n c e s: 2 For the Defendant Encoso-Abco: 3 SMITH ABBOT, L.L.P. 4 Three New York Plaza 5 New York, New York 10004 6 BY: MR. EDWARD F. ABBOT 7 For the Defendant Genuine Parts Company: 8 RILEY, McGUIRE, HEWITT & SWEETSER 9 600 Washington Road 10 Suite 300 11 Pittsburgh, Pennsylvania 15228 12 BY: MR. PATRICK R. RILEY 13 BARNHART, WILLIS, DICKEY & MOORE, L.L.C. 14 9200 Ward Parkway 15 Suite 310 16 Kansas City, Missouri 64114 17 BY: MR. CLAYTON E. DICKEY	1 of 1966 where I went to Genaut Industries in 2 Stephenville, Texas. and went to work. It was a 3 wholly-owned subsidiary of GAP or Genuine 4 Automotive Parts. and from there I went to 5 Morganfield in 1974. and I'm there until today. 6 Q. Okay, when you went to Morganfield in '74, were you 7 working for Rayloc? 8 A. No, it was still Genaut Industries. 9 Q. Okay, and when did your employer change from Genaut 10 Industries? 11 A. 1984. 12 Q. Who did you go to work for in '84? 13 A. Rayloc. 14 Q. You've worked for Rayloc ever since? 15 A. Yes. 16 Q. Okay. Can you explain let's go back to Genaut 17 Industries in 1966. Can you explain the 18 relationship, if any, to NAPA? 19 A. They supplied the NAPA distribution centers 20 throughout most of the central United States with 21 the exception of Oklahoma City and they also had a 22 branch at Tulsa, and they also had the Standard 23 Unit parts up in Chicago, Normal and Sank Village I 24 think it was a part of -- it was not part of OAP, 25 but we had the rest of it through the central all
16 I N D E X 17 CHARLES WILLIAM ALLEN PAGE 18 Examination by Mr. Gianaris 2 19 Examination by Mr. Abbot 10 20 Examination by Mr. Riley 21 21 Examination by Mr. Abbot 21 22 Examination by Mr. Gianaris 23 23 24 E X H I B I T S 25 DEPOSITION PAGE EXHIBIT NO. (NONE)	
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1 CHARLES WILLIAM ALLEN, 2 of lawful age, after having been first duly sworn 3 to tell the truth, the whole truth, and nothing but 4 the truth, testified as follows: 5 EXAMINATION 6 BY MR. GIANARIS: 7 Q. Sir, please state your name. 8 A. Charles William Allen. 9 Q. Charles William Allen? 10 A. Yes, A-L-L-E-N. 11 Q. Where do you live, Mr. Allen? 12 A. I live in Morganfield, Kentucky. 13 Q. Can you give us your address, please? 14 A. 206 Valley Drive. 15 Q. What's your date of birth? 16 A. 9-17-39. 17 Q. Okay, are you a married man? 18 A. Yes. 19 Q. Where do you work? 20 A. I work for Rayloc in Morganfield, Kentucky. 21 Q. Can you just -- let's rewind and go back to when 22 you got out of high school, let's say. Give me 23 your work history, if you would. 24 A. I went to work at Metro Electric Company in 25 approximately 1959. I worked there until mid year	1 the way out into Des Moines and Dewitt and Kansas 2 City. 3 Q. So, for a certain section of the country, Genaut 4 was a supplier for NAPA? 5 A. Yes. 6 Q. Supplier of auto parts? 7 A. Yes, remanufactured auto parts. 8 Q. Including brake linings? 9 A. Yes. 10 Q. What was your job -- go through your job starting 11 in '66 to the present. 12 A. I was a foreman in the plant. 13 Q. Okay. 14 A. And I moved from that to a plant manager, and 15 then, when I went to Morganfield, I was the plant 16 manager there, then, in '84 when the buyout came, I 17 went to general manager. 18 Q. Okay. And you're still general manager? 19 A. Yes. 20 Q. It's my understanding that Genaut had, for lack of 21 a better term and maybe it's the proper term, 22 competitors or a couple of competitors throughout 23 the country who also supplied NAPA, is that 24 correct? 25 A. Well, Genuine Parts would be one.