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1 Q. All right. Were all of the B's brake shoes?
 2 A. Yes.
 3 Q. Can a B also be a brake pad, disc brake pad?
 4 A. No.
 5 Q. What does RS stand for?
 6 A. Riveted.
 7 Q. Were all of the RS brake shoes?
 8 A. Yes.
 9 Q. Were all of the RS between 1960 and 1980
 10 asbestos-containing?
 11 A. Yes.
 12 Q. And the M, metallic, no asbestos?
 13 A. Correct. Yes.
 14 Q. When was the M introduced?
 15 A. The M was there when I started with the
 16 company in '71. It was a limited part numbers. It was
 17 primarily used for race cars, emergency vehicles. It
 18 had its own set of circumstances, as far as its
 19 performance. The normal person would not want to put
 20 it on their car.
 21 Q. The disc brake pads, what do they correspond
 22 to?
 23 A. S would be either an asbestos or an NAO,
 24 non-asbestos. We have to go with the time frame.
 25 Q. When was S introduced?

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1 A. That corresponds to asbestos.
 2 Q. Was that true 1960 to 1980, all AS were
 3 asbestos-containing?
 4 A. Yes.
 5 Q. What do the A and the S stand for?
 6 A. I don't know.
 7 Q. Okay. What other disc brake pads are there?
 8 A. MAS.
 9 Q. And what does that signify?
 10 A. Semi-metallic.
 11 Q. When were they introduced?
 12 A. Again, in the '70s.
 13 Q. What does the E -- does that have any --
 14 what does that correspond to?
 15 A. E?
 16 Q. Yes.
 17 A. We're not there yet.
 18 Q. Okay.
 19 A. We have ES.
 20 Q. ES. Okay?
 21 A. Okay. ES is asbestos.
 22 Q. And that would be true between '60 and '80?
 23 A. Yes.
 24 Q. What does the ES stand for?
 25 A. Let me go back. We might not have had ES back

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1 A. S was there when I started in '71.
 2 Q. And so in '71, were they all
 3 asbestos-containing, S's?
 4 A. S's? Yes.
 5 Q. At what point in time was there a non-asbestos
 6 option on the S?
 7 A. We'd go with MS, and it wasn't an option. If
 8 OEM came out with a semi-metallic puck pad, we plugged
 9 in MS. And you wouldn't have an S, it would only be
 10 available in MS.
 11 Q. So any time there's an S, that's an
 12 asbestos-containing product, as opposed to an MS?
 13 A. What time frame?
 14 Q. 1960 to 1980.
 15 A. Yes.
 16 Q. All right. And MS is what, semi-metallic?
 17 A. Yes.
 18 Q. When was the semi-metallic first introduced?
 19 A. In the '70s.
 20 Q. Are there any other disc brake pads, other
 21 than S and MS?
 22 A. Yes.
 23 Q. What are they?
 24 A. There's ES -- no -- there's AS.
 25 Q. What does that correspond to?

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1 in the '60s. But you gave me the time frame from the
 2 '60s through '80s. But it's still in that area. It's
 3 ES.
 4 Q. When was the ES introduced?
 5 A. That had to be in the '70s, late '70s.
 6 Q. And what does the ES stand for?
 7 A. I don't know.
 8 Then we had an MES that was semi-metallic
 9 for that line.
 10 Q. Okay. Any others that were out there?
 11 A. Any others what?
 12 Q. Any other disc brake pads?
 13 A. During what time frame?
 14 Q. '60 to '80.
 15 A. No.
 16 Q. I'm a little confused. The AB, I think you
 17 indicated, was American Brakeblok?
 18 A. Yes.
 19 Q. Why is there a specific manufacturer
 20 designation on one and not on the others?
 21 A. Well, because that was AB Stopper; and that's
 22 why they called it Stopper. That was the flagship at
 23 one time, before we came out with the B and the RS,
 24 the premium. So it just stayed that way.
 25 Q. Okay. Now, is it possible to put these