

Page 162

1 MR. DUMLER: I understand.
 2 (Plaintiffs' Exhibit LeCour 35 was marked.)
 3 Q. (By Mr. Dumler) I'm going to show you
 4 a document, Exhibit No. 35. It indicates NAPA through
 5 1975. Have you ever seen this document before?
 6 A. No.
 7 Q. Okay. This document refers to a publication
 8 called NAPA Outlook. Your recollection is you don't
 9 have any recollection of seeing that document back in
 10 '75, NAPA Outlook?
 11 A. No.
 12 Q. Do you have any recollection of whether or not
 13 any of the hazards of asbestos were ever published in
 14 any of the NAPA Outlook?
 15 A. When I was aware of it, no.
 16 Q. What other publications do you get from NAPA?
 17 MR. RILEY: Does he get from NAPA?
 18 Q. (By Mr. Dumler) Well, what other NAPA
 19 publications are you aware of?
 20 A. That's it. That's the only thing that I knew
 21 of.
 22 Q. Are you familiar with something called the
 23 NAPA Report?
 24 A. No.
 25 Q. Does Genuine Parts publish any newsletters or

Page 164

1 to their customers. And basically it was a joke book.
 2 There were jokes in it. It had some advertising in it.
 3 Q. Anything else? Any other publications that
 4 were done by Genuine Parts disseminated to the jobbers
 5 or others customers?
 6 A. Not to my knowledge.
 7 Q. Mr. LeCour, in your Genuine Parts Answers to
 8 Interrogatories, No. 167, it indicates that "Genuine
 9 Parts may have received warnings from various suppliers
 10 or vendors of friction product materials but cannot
 11 state the approximate date or content of the warnings."
 12 Do you have any knowledge of any of the
 13 warnings that Genuine Parts got from any supplier or
 14 vendor of friction products?
 15 A. No, I'm not aware of any.
 16 Q. You indicated earlier that there were three
 17 grades: professional, standard, and economy. Is that
 18 generally correct?
 19 A. Yes.
 20 Q. Was that the three grades that were available
 21 between 1960 and 1980?
 22 A. No.
 23 Q. What was available between '60 and '80?
 24 A. We had basically two. We had what we called
 25 our B and RS with basically no name. Then we had our

Page 163

1 brochures or flyers or anything else that go out to its
 2 customers?
 3 A. What time period?
 4 Q. Well, does it do it today?
 5 A. Well, in an official magazine format or paper,
 6 book format? They send out promotional materials all
 7 the time.
 8 Q. But it doesn't have a newsletter or anything
 9 like that it sends out to its customers?
 10 A. To my knowledge, no.
 11 Q. Has it ever -- between '60 and '80 -- between
 12 '60 and today, is there a newsletter?
 13 MR. RILEY: Well, I'll allow him to answer
 14 the question, but I'm going to object that this
 15 is beyond the scope of your list on your
 16 Deposition Notice. So he can answer as to his
 17 personal knowledge, but his answer is not as
 18 a person who's knowledgeable of the company.
 19 THE WITNESS: Parts Pick-Up.
 20 Q. (By Mr. Dumler) I'm sorry?
 21 A. Parts Pick-Up.
 22 Q. What's the Parts Pick-Up?
 23 A. That was a little magazine that paid tribute
 24 to a good dealer, jobber, operation. And this was
 25 offered to all jobbers, that they could in turn give it

Page 165

1 AB, called Stopper.
 2 Then during that time frame, we called it
 3 professional quality for the B and the RS. And Stopper
 4 was always AB.
 5 Q. What does the A and the B stand for in AB?
 6 A. AB is American Brakeblok.
 7 Q. Between 1960 and 1980, were all of the AB
 8 brake shoes asbestos-containing?
 9 A. Yes.
 10 Q. What does the B stand for?
 11 A. Just the B only?
 12 Q. Correct.
 13 A. Bonded.
 14 Q. Between 1960 and 1980, were all the bonded
 15 brake shoes asbestos-containing?
 16 A. Yes. Well --
 17 Q. Go ahead.
 18 A. Your question, all of the B's?
 19 Q. Yes.
 20 A. Yes.
 21 Q. Is there a distinction? Is there some
 22 B out there I'm not thinking about?
 23 A. Well, there was an M.
 24 Q. Okay.
 25 A. And that was metallic.