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1 A. No, there was no contract that I know of.
 2 Q. They were free to purchase brake linings from other
 3 manufacturers other than Abex?
 4 A. They could, but most of them didn't or any of the
 5 remanufactured parts.
 6 Q. Okay.
 7 (OFF-THE-RECORD DISCUSSION.)
 8 Q. Just a couple more questions. When an individual
 9 walked into a retail store and purchased brakes,
 10 they would not necessarily be purchasing Abex brake
 11 lining, is that correct?
 12 A. During what time frame?
 13 Q. Let's take your historical understanding prior to
 14 1966.
 15 A. They would be purchasing Abex material.
 16 Q. In any retail store?
 17 A. Yes, my understanding, yes.
 18 Q. And what about the NAPA jobbers?
 19 A. That's who we're talking about, the NAPA jobbers.
 20 Q. Okay, but they were free not to -- but the NAPA
 21 jobbers you just said --
 22 A. They were free to purchase water pumps or anything
 23 else from somebody else if they so choose, but most
 24 of them are all loyal. Abex was a long time
 supplier, and they were a good supplier. We still

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1 use them today as our supplier at Morganfield.
 2 Q. Okay, so then, after 1966 if someone walked into a
 3 NAPA store and purchased brake linings, would they
 4 necessarily be purchasing Abex brakes?
 5 A. In my opinion, it would be Abex in the NAPA boxes,
 6 yes.
 7 Q. And the basis of that opinion is what?
 8 A. What I've been told by Walter Devoo and all the
 9 people that I've associated with when I went to the
 10 Stephenville plant.
 11 Q. Again, you have no independent knowledge of that?
 12 A. No, sir, I do not other than doing changeovers and
 13 stuff on other product lines.
 14 Q. And stores that carried NAPA products, again, could
 15 sell other products as well, not just -- I'm not
 16 talking just brake linings --
 17 A. Yes.
 18 Q. -- they could sell a variety of products?
 19 A. Yes.
 20 Q. Some of those products could come from a NAPA
 21 distribution center?
 22 A. It's possible.
 23 Q. And some of them did not?
 24 A. Yes, it's possible.
 25 Q. Were you aware that NAPA stores, jobbers and the

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1 like, were selling products that did come from
 2 areas outside of distribution centers?
 3 A. Well, that was part of our business to go in and --
 4 if someone was buying water pumps, for example,
 5 we'd try to get their business and bring them into
 6 our plants and show them how we produced the units
 7 and, if they were not buying our water pumps,
 8 hopefully we could get their business. This was an
 9 ongoing deal. There was stores that would be not a
 10 NAPA -- not a NAPA store that would be selling any
 11 kind of product that we were trying to get their
 12 business; but the NAPA stores that I was in and any
 13 of these changes like water pump changes is always
 14 American Brakebloc.
 15 Q. Was there a time, in your opinion, that it was not
 16 American Brakebloc, American Brakebloc was not the
 17 only supplier of brake linings?
 18 A. I would say late -- late '80's, maybe early '90's.
 19 Q. And the basis of that knowledge is what?
 20 A. Well, BPI became the primary supplier I believe the
 21 year was 1989.
 22 Q. Did Genuine Parts manufacture its own line of brake
 23 linings?
 24 A. They don't manufacture brake linings.
 25 Q. Okay. Tell me about Rayloc brakes, did they

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1 manufacture their own brake linings?
 2 MR. RILEY: You said brake linings.
 3 MR. ARBON: I said, I'm sorry?
 4 MR. RILEY: You said they manufactured
 5 brake linings. He said they don't manufacture
 6 brake linings.
 7 Q. (BY MR. ARBON) Brakes?
 8 A. Back up to your original question.
 9 Q. Strike that. Give me one second, I'm sorry.
 10 Are you familiar with a gentleman named
 11 Paul Lacour?
 12 A. Yes.
 13 Q. What was his job title, as you understood it, the
 14 last time you saw him or what was his job title?
 15 A. You mean the last time I saw him?
 16 Q. Yes.
 17 MR. DICKEY: Do you know his title?
 18 A. I don't really know. I'm going to say customer
 19 service, but I'm not sure. It's changed over the
 20 last few years.
 21 Q. (BY MR. ARBON) How long have you known Mr. Lacour?
 22 A. Since probably since '84. I may have talked with
 23 him prior to. Let's make that like 1980.
 24 Q. Okay.
 25 A. Because I had some conversations I think with Paul