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1 Abex, in your mind, are the same company? 2 A. Yes. 3 Q. You use them interchangeably? 4 A. Yes. 5 Q. Okay. And you -- let me read something to you 6 here. When I asked to take this deposition, I 7 asked for the person most knowledgeable regarding 8 the sale or supply of products manufactured by 9 American Brakeblocc, also known as Abex, and/or its 10 successor to or through the NAPA distribution 11 centers generally on the national level. Do you 12 feel like, in your business organization, you would 13 be the person who fits that bill? 14 A. I wouldn't say national because I'm not familiar 15 with the west coast at all. 16 Q. Okay. But, other than the west coast, you feel 17 comfortable with that description? 18 A. Yes. 19 Q. Okay. 20 MR. GIANARIS: That's all I have. Thanks. 21 EXAMINATION 22 BY MR. ABBOT: 23 Q. Hello, Mr. Allen. My name is Ed Abbot. I 24 represent Pacumo-Abex Corporation. I have just a 25 couple questions.	1 over the BHT plant, and I became plant manager, and 2 he was flying back and forth running both plants. 3 We had people like John Hoving, for example, who 4 was a Houston distribution center manager. We were 5 talking to these people on a regular basis bringing 6 in customers trying to get the business, and this 7 would be all the people in Dallas, and I'm talking 8 about in jobbing stores, NAPA parts stores, 9 Houston, San Antonio. 10 Q. Okay. Let me just go back to the knowledge you 11 have prior to 1966 that's not based on your 12 personal knowledge? 13 A. Absolutely not. 14 Q. Could you do me -- you had mentioned NAPA jobbing 15 the past and distribution centers. 16 A. Right. 17 Q. Could you provide me with kind of your 18 understanding of what a NAPA distribution center 19 is, what a NAPA jobber is, and what the retail 20 store is, how that works, how that all works 21 together? 22 A. Let's start with the distribution center. Of 23 course, we used to call them warehouses back before 24 we went to distribution centers. These are people 25 that supply the NAPA parts stores for their
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1 A. Okay. 2 Q. Initially you just mentioned something about 3 representing Rayloc. You're an employee of Rayloc, 4 is that correct? 5 A. Yes. 6 Q. Are you employed by NAPA? 7 A. I'm employed by Genuine Parts Company. 8 Q. Are you employed by NAPA? 9 A. No, NAPA is a trade selling name. Genuine Parts 10 Company is who I work for. 11 Q. You had mentioned before, prior to 1966, the 12 information you have prior to 1966, that was 13 obtained through conversations you had with some 14 individuals? 15 A. Walter Devoe, who was the plant manager there. 16 Q. Do you recall roughly when you had that 17 conversation? 18 A. Well, it's from '66 through '70. 19 Q. Okay, the last time you talked to Mr. Devoe was 20 1970 then? 21 A. No. Are you talking about, when we're talking 22 about the information, we're talking about NAPA, 23 American Brakeblocc, the relationships to NAPA? 24 Q. Uh-huh. 25 A. He became general manager approximately that time	1 particular locations, whether it be Kansas City, 2 whether it be Dallas, Houston, San Antonio, all the 3 parts stores that are NAPA parts stores in those 4 areas. The distribution brings in product from a 5 lot of suppliers. They have -- they have engines, 6 belts, hoses, remanufactured parts, numerous 7 things, and they supply those exclusively to the 8 NAPA stores at that time. 9 The NAPA stores, which could be a company 10 owned or it could be an independent owned, they 11 stocked all of what they considered to be a stock 12 that they needed to supply their particular given 13 area and this went out to dealers, it could be 14 individual walk-in trade, companies, anyone that 15 they were going to be doing business with. 16 As far as the retail store, I don't think 17 I'm knowledgeable enough about the retail store to 18 talk about it. This is something that's fairly new 19 as far as the super stores. 20 Q. Okay. You've made a reference to NAPA stores. 21 that also the same as the terminology NAPA jobber? 22 A. Yes. 23 Q. Okay. Now, the NAPA jobbers they were not required 24 to purchase all of their materials from a NAPA 25 distribution center, is that correct?