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Page 14 1 absorbers and drive it with an electric motor just like a 2 truck would drive it and it stimulates the most severe 3 conditions an axle would undergo in its normal approved 4 application. 5 Q Would that also include the efficiency of the brakes 6 that were on the axles? 7 A It didn't at that time. There was a brake developed 8 by Eaton and built by Eaton that ended up at that particular 9 time had been moved to the brake division when the brake 10 division was formed and it was up in Southfield, Michigan. 11 Q When was the brake division first formed? 12 A It is my best recollection about 1974. 13 Q Why did Eaton, if you know, separate and develop 14 this new brake division? 15 A I think they wanted to probably focus more on the 16 brake market and we were able to do that when it was combined. 17 Q Prior to 1974, when the brake division was first 18 formed, how did Eaton test the sufficiency of the brakes on 19 the axles? 20 A When I started out, we were testing primarily with 21 test trucks and we followed SAE standards as far as running 22 those tests and basically we had to meet the criteria in those 23 SAE standards. 24 Q For the record, what are the SAE standards you are 25 referring to?	Page 16 1 administered our warranties. 2 Q At that time, did any of your job responsibilities 3 involve brakes? 4 A Not directly. 5 Q When you say not directly, how was it involved if it 6 was? 7 A Basically, the brake was bolted to an axle. And 8 basically, you came in contact with the performance of the 9 brake because you were -- usually, if there was a problem or 10 an issue with the brake, you called somebody from the brake 11 division in to get them involved in it at that point. 12 Q Did the warranty program -- did the warranty program 13 include problems with brakes? 14 A Not at that time. They had their own 15 administration. 16 Q So I guess the brake division did offer warranties 17 on the brakes, but they handled it themselves and not where 18 you were at that time? 19 A Yes. 20 Q It looks like you move on from 1980 to 1983, you 21 then become the manager of the service and parts for Eaton 22 truck components marketing; is that correct? 23 A Yes. 24 Q Can you describe where you were located when you 25 took over this position?
Page 15 1 A They had to do with different conditions where the 2 brake was run through severe operations, basically to measure 3 fade and wear, and things like that. 4 Q It is my understanding that the SAE regulations 5 established minimum safe braking -- I'm not sure what the 6 right word would be -- braking conditions for a brake? In 7 other words, it told you, the brake manufacturer, what your 8 brakes had to do when put on a certain type of truck; is that 9 correct? 10 A That's correct. 11 Q It looks like between 1977 and 1980, you then became 12 the manager of the technical services and warranty for the 13 axle division; is that correct? 14 A Yes. 15 Q Where were you located when you took over that 16 position? 17 A In Cleveland, same facility. 18 Q Could you again generally describe what your duties 19 were in that position? 20 A Basically represented the product in the service 21 area as far as product performance in the field, provided 22 technical support to both our OEM and field organization which 23 represented us to the fleets and dealers. And the warranty 24 supervisor reported to me and basically he dealt with the OEMs 25 which were the customers we sold the product to and	Page 17 1 A I moved to our corporate headquarters which was in 2 downtown Cleveland and had responsibility through the Eaton 3 truck components marketing which was the field organization 4 which included sales and service personnel distributed 5 throughout the United States and Canada. And I basically sort 6 of coordinated the service activities from the field back to 7 headquarters and product divisions and also ensured that 8 emergency parts were available. We had a system at that time 9 where we stocked some parts in our branches and I was 10 responsible for that. 11 Q Did any of the components that you were dealing with 12 include brakes? 13 A Yes, at that time, right. 14 Q Can you give me an example of what you would do? 15 When you talk about monitoring and service calls, things like 16 that, give me an example of the kinds of things you would do 17 on a regular basis as the manager of the service and parts 18 section. 19 A Well, since essentially we sold our products to the 20 truck manufacturers, if there was a problem in a field 21 operation in a fleet or end user or dealer, the system 22 basically worked where the OEM, they would report the problem 23 back to the OEM and the OEM, if they deemed it necessary, 24 would contact Eaton and we would go in jointly and research 25 that problem and try to come to some resolution.

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