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1 Q. At any point prior to 1988, did you have any
2 discussions with anybody at Genuine Parts, other than
3 your attorneys, about whether or not you needed
4 a warning on your boxes?

5 A. No.

6 MR. RILEY: Okay. That's where you're
7 getting tripped up.

8 Did somebody else at Genuine Parts make
9 a conscious decision before '88 that the
10 product was made in such a way that they
11 did not have to put a warning on it?

12 THE WITNESS: Yes.

13 MR. RILEY: And who was that?

14 THE WITNESS: That would have been the
15 general manager.

16 MR. RILEY: Do you know when that decision
17 was made?

18 THE WITNESS: No.

19 MR. RILEY: Okay.

20 Q. (By Mr. Dumler) Who was the general manager
21 who made that decision?

22 A. It would have been Ed Kipling.

23 Q. Ed Kipling?

24 A. Uh-huh.

25 Q. Did you ever have any discussions with

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1 A. No, I do not recall that date.

2 Q. You don't have any recollection of the
3 first --

4 A. No.

5 Q. Did you make any effort, in connection with
6 preparing for today's deposition, to find out when the
7 first lawsuit was filed against Genuine Parts for an
8 asbestos matter?

9 A. No.

10 Q. Do you know who you would go see to get that
11 information?

12 A. Yes.

13 Q. Who?

14 A. Scott Smith.

15 Q. What's Mr. Smith's position?

16 A. He's legal counsel for Genuine Parts Company.
17 (Plaintiffs' Exhibit LeCour 15 was marked.)

18 Q. (By Mr. Dumler) I hand you what's been
19 marked as Exhibit No. 15, which I'll ask you if you can
20 identify that document for me?

21 A. It's headed "Raybestos Manhattan Corporate
22 Headquarters, Product Liability." And it's Jim Arnold
23 at Balkamp, Inc., Indianapolis, Indiana.

24 Q. What else was Mr. Arnold's connection to
25 Genuine Parts?

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1 Mr. Kipling as to why he came to the conclusion that
2 no warning was required?

3 A. No.

4 Q. Did you ever go to Mr. Kipling and say, why
5 don't our boxes have a warning or are we warning or
6 I heard we're not warning?

7 A. Our understanding was, if you were processing
8 a product that is either making it from scratch, being
9 the friction material manufacturer, or rebuilding it by
10 removing the old friction material and putting on new
11 friction material, you are concerned about asbestos
12 dust, and you need to take precautionary measures.

13 But when we finished doing our process and
14 we shipped it out, there was no other need to do any
15 grinding, chipping, shifting, or anything to the
16 friction material. So it was not necessary to warn.

17 Q. When is the first time, sir, that Genuine
18 Parts was sued in connection with any asbestos claim?

19 A. I can't recall the first time.

20 Q. I've seen a reference in other material dated
21 1980. Do you have any recollection of that date?

22 MR. RILEY: I'll object to that well.

23 All right. Go ahead.

24 Q. (By Mr. Dumler) I'm just trying to help
25 things along here.

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1 A. I'm not aware. I don't know.

2 Q. Have you ever seen this document before?

3 A. No, I have not.

4 Q. Do you know why this would be in the files of
5 Genuine Parts?

6 A. Let me look...

7 MR. RILEY: Well, let me state for the
8 record, while he's reading it, that that
9 document was provided to counsel by Balkamp in
10 an effort to answer your interrogatories,
11 or interrogatories in another jurisdiction,
12 concerning the asbestos tape that was
13 previously tested by two in the deposition.

14 Q. (By Mr. Dumler) Do you have any knowledge
15 about the circumstances surrounding that request and
16 response from Raybestos?

17 A. No, I do not.

18 Q. Do you have any idea who would have, other
19 than Mr. Arnold?

20 A. No, I do not.

21 Q. Has Genuine Parts made any effort after 1980
22 to be added as an additional insured under any products
23 liability policy or purchase any products liability
24 policy itself in connection with any asbestos matter?

25 A. I'm not familiar with that, no.