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Q. Okay. Who is the other one?

A. Standard Units would be one.

Q. Any others?

A. I would say Oklahoma City would be one, that's Britain Brothers.

MR. ABBOT: Britain?

THE WITNESS: Britain Brothers.

MR. RILEY: B-R-I-T-T-A-I-N.

A. Britain Brothers.

MR. RILEY: And he's talking historical, not current.

MR. GIANARIS: Okay, right.

Q. (BY MR. GIANARIS) Okay, well, let's talk about that. How far back -- how far back does your historical knowledge of Genaut's relationship to NAPA go?

A. Well, Genaut was part of -- they were a wholly-owned subsidiary of Genuine Automotive Parts, but there was also another company BHT Products in Indianapolis that was also a wholly-owned subsidiary, and we were just like a sister. In fact, our plant manager the reason I became plant manager was because he was promoted to general manager of the two plants, and we both supplied GAP and all the NAPA stores that were

1 asking me did I know anything about it, and I
2 really didn't, I had never messed with one of those
3 before, it was an arcing grinder, high speed
4 grinder, and I'd say just in talking with people,
5 as far as I remember, a guy by the name of John
6 Franks who was in Indianapolis -- I'm sorry,
7 Evansville, Indiana, at the time, he came down and
8 they always introducing me to all these folks,
9 old-timers, and they were always telling me about
10 our relationship with the NAPA jobbers and American
11 Brakebloc, who I call Abex, and just the way of
12 conversation, I guess my teaching and training.

13 Q. So your teaching, training, and conversations with
14 people employed or affiliated with NAPA is what
15 you're basing your historical knowledge on?

16 A. When I was talking about the '30's, because my
17 knowledge with NAPA started in 1966.

18 Q. Right. So, prior to -- what you know about it
19 prior to 1966 comes from those --

20 A. That's correct.

21 Q. -- those sources I just mentioned?

22 A. Yes, that's right.

23 Q. Okay. So, going back historically before you
24 started in 1966 all the way let's say through the
25 1970's to the end of the 1970's, was Abex or

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1 supplied by GAP of remanufactured product, and the
2 BHT plant went all the way back into the '30's.

3 Q. Okay. Do you know how far back the other I'll call
4 them competitors, because that's how we termed it
5 earlier, competitors supplied NAPA?

6 A. To my knowledge, and this is just talking to Walter
7 Devoe, who is the plant manager there at
8 Stephenville, and all the old -- when we was
9 starting the new plant, we had a lot of old-timers
10 come in, see the new facility, and they was always
11 trying to teach me about NAPA because I really knew
12 nothing about NAPA at the time, and this goes --
13 they go all the way back into I'm sure Genuine
14 Parts and all of them all the way back in the
15 '30's, also. Everything was Abex at that time.

16 Q. Let me ask you about that. You say everything was
17 Abex?

18 A. Yes.

19 Q. Explain that to me.

20 A. Well, in all of our meetings, in fact, the day I
21 went to work at Stephenville, the American
22 Brakebloc representative was there, they were back
23 there him and Walter trying to set up a production
24 grinder to grind brake shoes, and this was a
gentleman named Dale Schoonover, and they were

1 American Brakebloc a supplier of friction
2 materials, brake friction materials, to NAPA?

3 A. Yes.

4 Q. Okay. Now, if a person went in a NAPA store to buy
5 brakes and they bought brakes, they came in a NAPA
6 box with a NAPA label on them, would those brakes
7 during that period of time have been supplied or
8 those friction parts in that box have been supplied
9 by Abex or American Brakebloc?

10 A. This is from '60 through the '70's or further back?

11 Q. Let's go back to your historical knowledge, what
12 you know, as far back as you know.

13 A. I'd say it goes all the way back somewhere in the
14 '30's.

15 Q. Okay. And that would be the situation throughout
16 the country including the parts your company
17 supplied and your competitors supplied to NAPA?

18 A. Yes.

19 Q. Okay.

20 MR. GIANARIS: I think that's all I have
21 for now.

22 MR. ABBOT: Let's take just a break for a
23 second.

24 (BRIEF RECESS TAKEN.)

25 Q. (BY MR. GIANARIS) Sir, American Brakebloc and