

10:42:17:22 different issues.

10:42:18:03 A Well, to get people to participate in
10:42:22:01 balloting, we sometimes would say we will destroy
10:42:25:01 your ballot when it comes in. Now on some of them
10:42:28:21 we did in.

10:42:30:03 Q To the extent you would take a poll of
10:42:32:16 your members with the condition that the replies
10:42:34:06 would be kept confidential or destroyed, what
10:42:36:21 would lead you to do that, what type of concerns
10:42:40:00 would you have had that would lead you to agree to
10:42:43:10 destroy the ballots?

10:42:44:12 A Well, that the information was of could
10:42:51:27 harm the participant who submitted the
10:42:54:15 information. For example, if you had a historical
10:42:58:09 sales thing and you reported your growth, how many
10:43:02:00 disk brake pads you sold this month, and if that
10:43:05:00 information came in and got out to your
10:43:07:13 competitor, they wouldn't know what you had. So
10:43:09:15 that kind of stuff we didn't sent out. Anything
10:43:12:04 that would embarrass, or make them reluctant to
10:43:16:10 participate in the plan, we would agree we would
10:43:19:09 discard that.

10:43:19:25 Q How about stuff that could be subpoenaed
10:43:20:09 later in litigation and used against the members,