

Page 154

1 Parts, have you gone out to the field to see whether or
2 not mechanics were in fact grinding your brake shoes?
3 A. Oh, yes.
4 Q. When have you done that?
5 A. I did that from 1971 through '75. And I did
6 it periodically, not specifically just to go see if
7 they're grinding or not, but going in and calling on
8 garages that do brake workup, until this year.
9 Q. From 1971 through 1975, what were you doing
10 that required you to see whether or not your products
11 were being ground?
12 A. I was conducting the brake clinics and the
13 clutch clinics and the electrical clinics. And I was
14 also selling the product to our jobber customers.
15 We would go along with the jobber salesman and
16 tell him why should you buy Rayloc and not Raybestos.
17 Q. I've seen the documents of a slide
18 presentation. Were you involved in that slide
19 presentation?
20 A. Well, there were several series of that.
21 But, yes, I had a slide presentation that I used.
22 Q. When did you prepare those slide
23 presentations?
24 A. That was given to me when I came to work for
25 the company.

Page 156

1 My question is: Was one of your angles, in an
2 effort to sell Rayloc, that you told garage mechanics
3 that you do not have to grind our shoes?
4 A. Yes.
5 Q. At any time, did you tell them any of the
6 dangers associated with actually grinding shoes related
7 to creating asbestos dust --
8 A. No.
9 Q. -- now, other than 1971 to '74, I think you
10 said?
11 A. '71 to '75.
12 Q. '75, what else were you doing to actually go
13 to particular garages? Just go on sales calls?
14 MR. RILEY: Time period?
15 MR. SMITH: When?
16 Q. (By Mr. Dumler) After 1975?
17 A. No.
18 MR. RILEY: No. He said '71 to '75.
19 Q. (By Mr. Dumler) No. I said other than '71
20 to '75. After '75, what else were you doing to go visit
21 specific mechanics?
22 A. I would be going for problem calls where they
23 were having a problem with our product, not just
24 specific brake product, but any product. We had
25 19 product lines.

Page 155

1 Q. So you would go out to various garages and
2 give them presentations about how or why they should use
3 your particular products?
4 A. Yes.
5 Q. During the course of any of those
6 presentations, did you warn any or advise any mechanics
7 about the dangers associated with asbestos dust from
8 grinding?
9 A. No, I did not.
10 Q. In any of those slide presentations, was there
11 ever any indication or warning about the dangers
12 associated with creating asbestos dust?
13 A. No, there was not.
14 Q. In connection with selling Raybestos products,
15 one of your angles was that you did not have to grind
16 your brake shoes or pads; is that correct?
17 A. No. You said Raybestos.
18 Q. I'm sorry. Rayloc.
19 A. And I would inject this: that that is the
20 main problem out there, a lot of people -- Raybestos was
21 king in selling brake shoes. And a lot of people
22 thought we, Rayloc, were Raybestos. So when you ask
23 them, whose brakes did you use, we used the Rayloc; but
24 actually it was Raybestos.
25 Q. Thank you.

Page 157

1 Q. How often would you do that?
2 A. Maybe a dozen times a year.
3 Q. In those instances in which you attempted to
4 distinguish your product from other products that needed
5 to be ground, who were the competitors that you singled
6 out as companies producing products that you had to
7 grind?
8 A. We always used the practice that you never
9 knock your competition. So we never talked about our
10 competition, we only talked about the benefits of our
11 products.
12 Q. One of the benefits, you testified, was that
13 you didn't have to grind your product?
14 A. That's correct.
15 Q. What would you do in comparing your product to
16 other products? Would you say the other products you
17 have to grind?
18 A. No. We would just say that you don't have to
19 do anything to modify our shoes to install them.
20 Q. Did you ever visit Mr. Novo's gas stations in
21 New Jersey?
22 A. No, I did not.
23 Q. Did you ever visit any of the jobbers in
24 New Jersey?
25 A. I cannot recall.

40 (Pages 154 to 157)