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Q. Do you know whether or not there's any relationship between Genuine Parts' efforts to be added as an additional insured under product liability coverage and any lawsuits that were filed in 1980 against Genuine Parts for an asbestos matter?
A. I'm not aware.
Q. You don't know one way or the other?
A. I'm not aware.
Q. Now, between --
MR. RILEY: Well, for the record, that exhibit, which speaks for itself, relates to Ballkamp's request, not Genuine Parts'.
MR. DUMLER: Okay.
Q. (By Mr. Dumler) Now, between 1960 and 1980, who was the primary supplier of friction materials to Rayloc?
A. Abex.
Q. How long after 1980 did Abex continue to be the primary supplier to Genuine Parts?
MR. RILEY: Of --
Q. (By Mr. Dumler) Of friction material.
A. Until the '90s.
Q. When in the '90s did Abex stop being the primary supplier of friction material to Genuine Parts for brakes?

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A. It would have been the early '90s.
Q. '91, '90/91?
A. Between '90 and '95.
Q. Who became the primary supplier after Abex stopped being the primary supplier?
A. BPI.
Q. I'm sorry. BPI?
A. Uh-huh.
Q. Who is BPI?
A. Brake Parts, Incorporated, which at that time was owned by Echlin.
Q. Was there a written agreement between Abex and Genuine Parts for the supply of brake products?
A. No.
Q. Am I correct that Bendix was the next most frequent supplier between 1960 and 1980?
A. Yes.
Q. What was the reason that Genuine Parts preferred to use Abex over Bendix between 1960 and 1980?
A. Because of the long working relationship.
(Plaintiffs' Exhibit LeCour 16 was marked.)
Q. (By Mr. Dumler) I've given you what's been marked as Exhibit No. 16. And it appears to be a letter from Abex. Are you familiar with that document? Can you identify it for me?

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A. Its letterhead is Abex, IC Industries. It's to Joseph White with Rayloc.
MR. RILEY: What's the date?
THE WITNESS: The date is December 7th, 1987.
Q. (By Mr. Dumler) The letter references a decision by Abex to stop the production of asbestos-containing brake parts; is that correct?
A. Yes, it does.
Q. When were you initially informed that Abex was going to discontinue selling asbestos-containing brake products?
A. I personally don't remember.
Q. This indicates it's the official notification. My question is whether you had heard before this that they were --
A. Oh, yes.
Q. -- heading in this direction?
A. Yes.
Q. How long before the official notification did you learn that --
A. They had a lot of -- well, it had to be two to three years prior, let's say two years prior to the '87 date.
Q. I'm sorry. Two years prior?

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A. Uh-huh.
Q. And is it correct that in the two years before this December 7th, 1987, you started to get shipments of non-asbestos brake linings from Abex?
A. We got some shipments, yes.
MR. DUMLER: Let's have this marked as the next exhibit.
(Plaintiffs' Exhibit LeCour 17 was marked.)
Q. (By Mr. Dumler) Can you identify Exhibit No. 17 for me?
A. It's a handwritten note from Joe Benator to Paul LeCour. And it's dated 1/28/87. Okay.
Q. That note references that you were starting to get non-asbestos brake linings from Abex; is that correct?
A. Yes.
Q. All right. This would be consistent with what you understood about Abex was going to be phasing out asbestos-containing products; is that right?
A. Yes.
Q. Now, there's a reference in there with respect to using up all the old friction material, the asbestos-containing friction material?
A. Yes.
Q. So was there a conscious decision made, before