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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-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

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

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

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

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

A. Yes.

Q. Explain that to me.

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

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

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

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

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

A. That's correct.

Q. -- those sources I just mentioned?

A. Yes, that's right.

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

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

A. Yes.

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

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

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

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

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

A. Yes.

Q. Okay.

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

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

(BRIEF RECESS TAKEN.)

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