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1 Q. Was there any shift in your duties and
2 responsibilities of personnel at Genuine Parts or Rayloc
3 from before the insurance company notified you about the
4 hazards of asbestos to after the company notified you
5 about the hazards of asbestos?
6 A. No.
7 Q. Was there any department that assumed
8 responsibility, any greater responsibility with respect
9 to the dangers or hazards associated with asbestos after
10 you were notified by your insurance company, as compared
11 to before you were notified?
12 A. No.
13 Q. Did the company employ any consultants, other
14 than through its insurance company, with respect to the
15 dangers or hazards of asbestos after it was first
16 notified by its insurance company?
17 A. No.
18 Q. Did Genuine Parts attempt to investigate any
19 of the hazards or dangers of asbestos after it was
20 notified by its insurance company, other than the work
21 it did in connection with its insurance company at the
22 plant?
23 A. Well, when they were made aware that it was
24 a potential hazard to a person's health, they took
25 corrective action immediately to prevent any exposure

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1 received any medical literature about the dangers or
2 hazards of asbestos?
3 A. I do not recall that, no.
4 Q. Does Rayloc have an industrial hygienist or
5 medical doctor on staff?
6 A. No, they do not.
7 Q. After you were notified about the dangers or
8 hazards of asbestos from your insurance company, was
9 there any decision or discussion about whether or not
10 you should hire an industrial hygienist or a medical
11 doctor at any of the Rayloc facilities?
12 A. Not that I can recall.
13 Q. Has Genuine Parts or Rayloc ever employed the
14 services of any outside industrial hygienist or medical
15 doctor with respect to the asbestos in its plants?
16 A. With respect to asbestos in its plants or the
17 exposure to the employee?
18 Q. Either/or.
19 A. You have to rephrase your question, please.
20 Q. Okay. Has Rayloc or has Genuine Parts ever
21 gone out and hired an industrial hygienist or medical
22 doctor as a consultant in any way related to asbestos?
23 A. No.
24 Q. I've seen in the documents that were produced
25 to me yesterday Material Safety Data Sheets.

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1 to excessive dust.
2 Q. That was at the plant?
3 A. At the plant.
4 Q. Can you tell me who the person was at Genuine
5 Parts who was responsible for investigating whether or
6 not Genuine Parts products were producing dust when
7 mechanics used them in the normal course of their work?
8 A. That were producing dust or were not producing
9 dust?
10 Q. Were or were not.
11 A. Were not -- was anyone appointed?
12 Q. Let me ask you -- let me rephrase the
13 question.
14 Was anyone appointed or did anyone have the
15 specific responsibility of saying, we should ensure that
16 mechanics who are using our products are not producing
17 dust when they use our product, after you learned about
18 the hazards from your insurance company?
19 A. Our product did not have dust in it, so we had
20 no reason to appoint someone.
21 Q. So the answer is there was no one appointed to
22 ensure what you already knew, I guess?
23 A. Well, we ensured it by making sure we kept it
24 in the plant.
25 Q. Are you aware of anyone at Genuine Parts who

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1 A. (Nods head affirmatively.)
2 Q. You have to say "yes."
3 A. Yes.
4 MR. RILEY: You're asking him to agree
5 that you saw them yesterday.
6 MR. DUMLER: You can't shake your head.
7 MR. RILEY: You have to ask a question.
8 Q. (By Mr. Dumler) Are you familiar with
9 Material Safety Data Sheets?
10 A. From whom?
11 Q. Are you familiar with them in general?
12 A. Yes.
13 Q. When is the first time that you have any
14 recollection of receiving a Material Safety Data Sheet
15 from any manufacturer?
16 A. I don't recall the exact time.
17 Q. Can you give me a general time frame?
18 A. '80s, late '80s.
19 (Plaintiffs' Exhibits LeCour 10, 11, and 12
20 were marked.)
21 Q. (By Mr. Dumler) I'll give you 10, 11, and 12.
22 First take a look at Exhibit No. 10, and tell
23 me what that is.
24 A. It's an Abex Material Safety Data Sheet.
25 Q. When did you first begin to receive Material

26 (Pages 98 to 101)