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1 Safety Data Sheets from Abex? At the same time frame,
 2 late '80s?
 3 A. Yes.
 4 Q. Nos. 11 and 12, what are those documents?
 5 A. Material Safety Data Sheets, Abex lining.
 6 That's it.
 7 Q. These are prepared by Rayloc; is that correct?
 8 A. This item 11 would have been prepared by
 9 Rayloc.
 10 Q. Did you have any involvement in preparing that
 11 document?
 12 A. No, I did not.
 13 Q. Do you know where the information that was
 14 placed on that document came from? It looks like
 15 a computer-generated document.
 16 A. It would have come from Abex, because it
 17 designates Abex lining.
 18 Q. So the information is provided by Abex. And
 19 then it's just simply put on the sheet by Rayloc;
 20 is that correct?
 21 A. Yes.
 22 Q. All right. Prior to getting the Material
 23 Safety Data Sheet, was there ever any other data or
 24 product information that was sent to you by any of the
 25 manufactures along the same lines as this, warning of

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1 A. Yes.
 2 Q. Did Genuine Parts use this document in
 3 connection with its Rayloc operation?
 4 A. No.
 5 Q. What's the reason that you or someone else
 6 at Genuine Parts would get a copy of this document?
 7 A. FMSI itself is supported by the manufacturers
 8 of friction material. We would get this document here
 9 to look at, for cataloging purposes, to make sure as
 10 a comparison of what we are cataloging versus what
 11 they're saying to catalog.
 12 We also wanted to do it on thickness, because
 13 they do supply the thickness of the material in the
 14 back. And then how is it attached, it tells you whether
 15 it's integrally molded or whether it's riveted. I'm
 16 speaking of a disc pad. That's the reason why we would
 17 use it.
 18 It also gives specifications of the drum
 19 diameter, the width. So we would use it for really
 20 brake shoe and disc pad identification purposes.
 21 Q. So when the catalog, the FMSI catalog, came
 22 out, would you compare that catalog to the catalog you
 23 were producing?
 24 A. Well, it wouldn't be 100 percent. But, yes,
 25 if they came out with any new information, we always

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1 any particular dangers or health hazards?
 2 A. Not that I can recall.
 3 (Plaintiffs' Exhibit LeCour 13 was marked.)
 4 Q. (By Mr. Dumler) I've given you Exhibit
 5 No. 13, an FMSI Brake Shoe Identification Catalog.
 6 And other than the name, can you tell me what this is?
 7 A. Friction Material Standard Institute.
 8 Q. What is the catalog used for?
 9 A. Well, the catalog is used to specify by
 10 application what strip lining or what friction material
 11 you'll use on that particular application.
 12 Q. All right. Is this a document that came from
 13 your personal file?
 14 A. It could have. I have copies like this.
 15 Q. How long have you been getting copies of this
 16 particular catalog from FMSI?
 17 A. Well, it doesn't come out all the -- or
 18 regularly. So I would say it would have been started in
 19 the late '70s, early '80s.
 20 Q. The date on this is '73. Do you have any
 21 recollection of receiving this document prior to 1973
 22 or another catalog from a prior year?
 23 A. I've seen some in prior years.
 24 Q. All right. So what's the earliest, early
 25 '70s, that you --

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1 looked at the new information from a dimensional point
 2 of view. And that's what we used it for, to make sure
 3 we had the applications covered.
 4 Q. Who would be responsible for going through the
 5 catalog and comparing it to your particular catalogs?
 6 A. What time frame?
 7 Q. Well, let's say the 1970s.
 8 A. I would.
 9 Q. So did you receive each of the catalogs that
 10 came out from FMSI --
 11 A. Uh-huh.
 12 Q. -- in the 1970s?
 13 A. Uh-huh.
 14 Q. At the back of this catalog, Bates No. 120535
 15 there's recommended procedures for reducing asbestos
 16 dust during brake servicing.
 17 Are you familiar with that document?
 18 A. Yes, I am.
 19 Q. When did you first learn about those
 20 recommended procedures from FMSI?
 21 A. I can't recall the exact time, but these
 22 procedures we used internally every day at Rayloc.
 23 Q. Do you remember taking those procedures and
 24 matching them against the procedures you were using
 25 in-house?

27 (Pages 102 to 105)