

Page 26 1 Q Do you know if Eaton at any time during the time you 2 were there ever had Eaton employees grind brake linings? 3 A As far as I know, and I was not directly involved, 4 this is talking the manufacturing side in the factory, I guess 5 I knew of it. I never really experienced that process, you 6 know, firsthand. 7 Q Based on your knowledge of the company, where was 8 that taking place, the actual manufacturing of the brake 9 linings and the brake shoes? 10 A In that particular period of time? 11 Q You didn't manufacture brake linings. Let me take 12 it back. During that time frame, prior to 1983, where within 13 Eaton did that process take place? 14 A Marion, Ohio; Gallatin, Tennessee; Louisville, 15 Kentucky. I think that's it. 16 Q Did there ever come a time when Eaton stopped 17 allowing its employees to grind its brake linings? 18 MR. QUICK: Objection to the characterization 19 about allow but go ahead and answer. 20 A Yes. It was my understanding basically as a process 21 improvement, they decided to try to move that operation back 22 to the suppliers' operation and obtain preground lining 23 materials or prefinished. 24 Q Do you recall when that took place? 25 A It was around 1980-'81, somewhere in there.	Page 28 1 the same type of operation that I had before except it 2 expanded some of my responsibilities because of the higher pay 3 rate and overall direct responsibility to some of the field 4 people. 5 Q Can you be a little more clear? Describe what you 6 did as the general service manager. You are now in Michigan; 7 is that correct? 8 A Yes. I'm now in Michigan and basically I had 9 responsibility for setting policy for the field service people 10 that basically were stationed around the U.S. and Canada, 11 working out of our regional offices. And those people 12 basically called on dealers and fleets, supporting our 13 products through service and training and those types of 14 things. 15 Q Did you have any overall responsibility for the 16 brake division? 17 A Not for the brake division but the brake division 18 funded part of our truck components marketing organization. 19 Q How did they do that? Describe the process. 20 A Basically, each year we agreed on an annual budget 21 for the overall truck components marketing and the three 22 product divisions, transmission, axle and brake division 23 contributed to that pool to fund that budget. So we 24 essentially were their representatives in the field. 25 Q During the time that you were there between 1983 and
Page 27 1 Q It is your understanding at some point, Eaton - I'm 2 trying to say this without being too objectionable - Eaton 3 stopped the process of grinding at its plants and negotiated 4 with the brake manufacturers to pregrind the brakes before 5 those brakes arrived at the Eaton facilities? 6 A Yes. 7 Q And you think that happened some time around 1980? 8 A Late '70s, early '80s. 9 Q Do you know of any other reasons why Eaton decided 10 to do that other than process improvement? 11 A Well, I think taking a process out of our own 12 facility and putting it back at the source was always 13 something that you looked - if you could do that, you would 14 try to do that to try to streamline the process. 15 Q Do you know if any health concerns were included in 16 the reasons why they decided to push this process back to the 17 brake lining suppliers? 18 A I don't know specifically if there were. 19 Q It looks like from 1983 to 1991, you are the general 20 service manager for Eaton; is that correct? 21 A Yeah, Eaton truck components marketing. 22 Q Where were you when you took over that job? 23 A It started out - actually, we moved from Cleveland 24 in 1983 and we were in Galesburg, Michigan. That's when I was 25 promoted to that position which was essentially the boss of	Page 29 1 1991, were you familiar with the major OEMs that Eaton did 2 business with? 3 A Yes. 4 Q Can you name for me the OEMs that Eaton did business 5 with during the time frame 1983 to 1991? 6 A Again, Ford Motor. Actually, Volvo probably in that 7 period replaced White Motor. GMs in the medium duty area, 8 Kenworth, Peterbilt, Mack, Crane Carrier, Freightliner. I 9 guess that is it. 10 Q International? 11 A Oh, International, sure. 12 Q Anybody else you can think of? That was pretty good 13 off the top of your head. 14 A At that time, I think some of the other ones had 15 gone by the wayside, gone out of business. Those are the 16 major ones. 17 Q Of the group that you just named, were some more 18 significant a customer than others? 19 A Yes. 20 Q Can you name for me the top three or four customers 21 out of this group that you can recall? 22 A I would say through that period, Peterbilt and 23 Kenworth had evolved into major customers of ours. Ford 24 started to diminish. Freightliner was also probably one of 25 the top three.