department prior to 1976?
A. There was no position as mine prior to 1976, as far as the job title and position.
Q. Who performed the duties and responsibilities prior to 1976 that you performed from '76 to '91?
A. It would have been Joe Huff.
Q. Where did Mr. Huff go after 1976?
A. He went to Hancock, Maryland.
Q. What was his position?
A. General manager.
Q. You indicated that you were not responsible for what went on the packaging?
A. (Nods head affirmatively.)
Q. Who was the person or department at either Genuine Parts or Rayloc that was responsible for the design of the packaging?
A. During what time frame?
Q. Well, let's start with '71 to '76. Do you know who was responsible during that period of time?
A. That would have been marketing and sales.
Q. How about prior to 1971?
A. They really had sales department, they didn't have marketing.
Q. And how about after 1976?
A. Marketing.

Q. In your position between 1971 and 1976, were you responsible for ensuring compliance with any Federal regulations?
A. Between '71 and prior to '76, I was not responsible for that.
Q. Who was responsible during that period of time for ensuring compliance with any Federal regulations?
A. That would have been the general managers of the plant.
Q. What were your duties and responsibilities after 1991 when you became a plant production manager?
A. What my duties?
Q. Yes.
A. Responsibility for production, what was going out of that plant, and the product, the end product itself.
Q. It's my understanding that Genuine Parts was incorporated sometime in the 1920s; is that correct?
A. Yes.
Q. And at that time, it was part of the association that's referred to as NAPA; is that correct?
A. It was what now?
Q. It was a member of NAPA; is that correct?
A. It was a member of NAPA, yes.
Q. I don't want to have to go through the other

depositions. So in order to save time, I don't want to reinvent the wheel here.
But am I correct that in the 1920s, there were a number of NAPA members?
A. Yes.
Q. Has Genuine Parts purchased most of those members as of this time?
A. Yes.
Q. How many members of NAPA are there today?
A. Three.
Q. How many NAPA members were there in the 1920s?
A. I can only recall when it first started, about 28.
Q. Has NAPA purchased 24 of those original members?
A. I don't know if they purchased 24 or not. I don't have that number.
Q. When the original 28 were -- with the original 28 members, were they members from different areas of the country?
A. Yes.
Q. And has NAPA -- I'm sorry -- has Genuine Parts' expansion throughout the country coincided with its purchasing of different NAPA members?
A. Yes.

Q. So in other words, if Genuine Parts wanted to expand into a particular state, it may purchase a NAPA member in that state?
A. Yes.
Q. When did Genuine Parts purchase -- I'm sorry -- when did Genuine Parts move into the state of New Jersey?
A. I don't recall.
Q. I have seen in your Answers to Interrogatories that Genuine Parts opened a distribution center in 1966. Do you have any recollection of it in South Plainfield --
A. South Plainfield? Yes.
Q. -- opening in 1976?
A. In the '60s. I don't recall the exact date.
Q. So sometime in the '60s, Genuine Parts began to do business in the state of New Jersey; is that correct?
A. Yes.
Q. Did it purchase an existing NAPA member?
A. I do not know.
Q. Can you tell me what is the relationship between Genuine Parts and Rayloc?
A. We are a division of the Genuine Parts Company.