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1 Q. Have you visited the South Plainfield
2 Distribution Center?
3 A. I cannot recall.
4 Q. Are you aware of any documents related to the
5 sales from the South Plainfield Distribution Center to
6 any of the jobbers in that area?
7 A. No, I'm not.
8 Q. Have you made any efforts to look for any?
9 A. No, I have not.
10 Q. Do you know where they would be located if
11 they did exist?
12 A. Well, if they exist, they would be at the
13 distribution center. What time frame are you talking
14 about?
15 Q. 1960 through 1980.
16 A. With our retention policy, I don't think that
17 you will find anything going back to that time period.
18 Q. At what point --
19 MR. RILEY: For the record, while he did
20 not, a search was made; and there were no
21 records.
22 Q. (By Mr. Dumler) At what point in time did the
23 distribution centers begin to computerize their sales to
24 local jobbers?
25 A. I can't recall the exact -- well, actually,

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1 A. I don't know when marketing conferences
2 started. It had to be prior to 1971 when I started with
3 the company, because I heard, you know, they had other
4 ones.
5 Q. All right. So from '71 through the '80s,
6 there was an annual NAPA marketing convention?
7 A. Yes.
8 Q. How many days did they span?
9 A. Normally that's one day.
10 Q. Were there presentations, or is it like
11 a fair, where you go and there are booths?
12 A. All the above. It was -- we had display
13 tables for the manufacturers. And then, of course,
14 they had presentations that were put on by NAPA.
15 Q. At any of these national marketing
16 conventions, was there any presentation or discussion
17 aimed at alerting any of the jobbers to the dangers of
18 asbestos?
19 A. No, there was not.
20 Q. At any of the national marketing conventions,
21 was there any presentation or any effort to alert
22 jobbers that there should not -- that mechanics should
23 not be grinding brake shoes or brake pads?
24 A. For what reason?
25 Q. At all. Was there any effort to say --

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1 TEMS was the system. And that had to be in the '80s.
2 MR. DUMLER: All right. Let's take
3 a two-minute break so I can look at my notes
4 here.
5 (Recess was taken.)
6 Q. (By Mr. Dumler) Mr. LeCour, am I correct that
7 Genuine Parts -- strike that -- that NAPA held annual or
8 national meetings, convention-type meetings? I'm not
9 correct in the way you're looking at me?
10 A. Yes.
11 Q. I am correct?
12 A. Yes.
13 Q. What was the purpose of those? Were they
14 conventions? What were they?
15 A. They were called marketing conferences. And
16 they were to display what's coming up for the next year,
17 what our motto was going to be, and any new products
18 available. And it was, you know, a get-together with
19 our customers, the NAPA jobbers.
20 Q. And were they in fact held annually?
21 A. Annually.
22 Q. How many days? Was it a multi-day event?
23 MR. RILEY: Can we put a time frame on it
24 as to when they started?
25 Q. (By Mr. Dumler) When did they start?

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1 A. Well, our sales materials said it is not
2 necessary to grind our product, just go ahead and
3 install it, and you can get more cars into your garage
4 a day and make more money. That was from a performance
5 reason only. It had nothing to do with any other
6 reason.
7 Q. There was never any indication that there
8 might be a safety reason not to grind the shoes or pads?
9 A. Safety. If they were ground and you ground
10 them incorrectly, you could create a locked-up wheel,
11 creating a safety hazard by causing the car to go out
12 of control.
13 So that would have been part of the issue.
14 Q. Was there a publication that was sent to NAPA
15 jobbers by NAPA?
16 A. Many publications. What are you referring to?
17 Q. Well, how many publications are there?
18 There's something called NAPA Outlook?
19 A. NAPA Outlook is not that old.
20 Q. When was that started?
21 A. I can't recall, but it was not in the '70s,
22 to my recollection.
23 Q. Well, maybe I can help you.
24 MR. RILEY: Okay. He's not being offered
25 as a witness on behalf of NAPA.