

Page 6

Exhibits (Continued)	Page	Line
1 Plaintiffs' Exhibit LeCour 14, ... 111	2	
(Precision Materials Work Practices Guide NOVO110023-036)		
2 Plaintiffs' Exhibit LeCour 15, ... 120	17	
(Letter dated 2/10/81 NOVO30002-003)		
3 Plaintiffs' Exhibit LeCour 16, ... 123	21	
(Letter dated 12/7/87 NOVO30868)		
4 Plaintiffs' Exhibit LeCour 17, ... 125	8	
(Handwritten Notes NOVO40839)		
5 Plaintiffs' Exhibit LeCour 18, ... 126	24	
(Letter dated 7/23/91 NOVO121329-334 and Memo dated 2/19/91 NOVO121301)		
6 Plaintiffs' Exhibit LeCour 19, ... 129	12	
(Memo dated 2/18/91 NOVO121328)		
7 Plaintiffs' Exhibit LeCour 20, ... 129	12	
(Memo dated 2/5/91 NOVO121324-127)		
8 Plaintiffs' Exhibit LeCour 21, ... 129	12	
(Letter dated 1/31/92 NOVO121346-347)		
9 Plaintiffs' Exhibit LeCour 22, ... 131	17	
(Wall Street Journal Ad NOVO30846)		
10 Plaintiffs' Exhibit LeCour 23, ... 131	17	
(Newsbreaks, Asbestos-Free Bonding Segments NOVO30953-964)		

Page 8

Exhibits (Continued)	Page	Line
1 Plaintiffs' Exhibit LeCour 33, ... 148	13	
(Engineering Report, The Travelers, By David W. Glassman NOVO20415-432)		
2 Plaintiffs' Exhibit LeCour 34, ... 152	17	
(Engineering Report, The Travelers, By David W. Glassman NOVO20433-441)		
3 Plaintiffs' Exhibit LeCour 35, ... 162	2	
(NAPA through 1975 NAPA Outlook Publication NOVO11857-925)		

Page 7

Exhibits (Continued)	Page	Line
1 Plaintiffs' Exhibit LeCour 24, ... 133	23	
(American Brakeblok Ad NOVO30370-375)		
2 Plaintiffs' Exhibit LeCour 25, ... 137	3	
(Memo dated 9/7/88 NOVO110407)		
3 Plaintiffs' Exhibit LeCour 26, ... 137	3	
(Memo dated 9/7/88 NOVO110409)		
4 Plaintiffs' Exhibit LeCour 27, ... 139	19	
(Photocopies, Rayloc Remanufactured Brake Shoes Labels NOVO110410)		
5 Plaintiffs' Exhibit LeCour 28, ... 140	12	
(Photocopies, NAPA Labeling NOVO900001-021)		
6 Plaintiffs' Exhibit LeCour 29, ... 141	16	
(Photocopies, Raybestos Labeling NOVO20049-051)		
7 Plaintiffs' Exhibit LeCour 30, ... 142	17	
(Letter dated 10/26/71 NOVO51103-104)		
8 Plaintiffs' Exhibit LeCour 31, ... 143	5	
(Engineering Report, The Travelers, By Joseph E. David, III NOVO20287-301)		
9 Plaintiffs' Exhibit LeCour 32, ... 147	24	
(Report, The Travelers NOVO20052-073)		

Page 9

1 COURT REPORTER: Pursuant to the
2 disclosure law, I was retained for this
3 deposition by Plaintiffs. I have no contracts
4 with anyone, and everyone is being charged our
5 usual and customary rates for this deposition.
6
7 PAUL L. LECOUR,
8 being first duly sworn, was examined and deposed
9 as follows:
10
11 CROSS-EXAMINATION
12 BY COUNSEL FOR THE PLAINTIFFS
13 BY MR. DUMLER:
14 Q. Would you state your full name, please.
15 A. Paul Louis LeCour.
16 Q. Mr. LeCour, my name is Mark Dumler. We met
17 just moments ago. You understand you're here as
18 a corporate designee of Genuine Parts Company?
19 A. Yes.
20 Q. I'm going to have the court reporter mark
21 this as Exhibit 1, which is the Notice of Deposition for
22 today, and ask you if you have had a chance to look at
23 that document before today?
24 A. Yes.
25 (Plaintiffs' Exhibit LeCour 1 was marked.)
Q. (By Mr. Dumler) Have you also had a chance

3 (Pages 6 to 9)