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Q. How long has Rayloc been a division of Genuine Parts?
A. I would say ever since we bought Collier. And that's where the name Rayloc came from.
Q. What year was that?
A. That had to be back in the '60s. I don't know exactly the year.
Q. What other divisions or departments does the Genuine Parts Company have?
A. We have Balkamp that we are a partner in. We're not the sole owner of it.
We have a subsidiary, which is EIS, which is Electrical Insulator Electronic Supplies, nothing to do with automotive.
We have S.P. Richards, which is office supplies, pens and pencils.
We also have Motion Industries, which are bearings and hydraulic drive systems, nothing to do with automotive.
MR. RILEY: To the extent that the question asked divisions versus subsidiaries, he's not qualified to give you what the legal --
MR. DUMLER: I understand.
Q. (By Mr. Dumler) Other than automotive parts,

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Genuine Parts is involved in other lines of business?
A. Yes.
Q. Do any of those other lines of business incorporate asbestos or did they incorporate asbestos into any of their products?
A. Balkamp.
Q. What asbestos-containing products did Balkamp deal with?
A. They sold an asbestos tape.
Q. What years did Balkamp sell an asbestos tape?
A. I don't recall.
Q. Is it still manufactured?
A. No.
Q. What year was it discontinued?
A. I don't know that.
Q. Do you recall whether it was manufactured in the '60s and '70s?
MR. RILEY: Okay. For the record, he said they sold. He did not say they manufactured.
Q. (By Mr. Dumler) Do you recall whether Balkamp sold asbestos tape in the '60s and '70s?
A. It would have been in the -- I cannot speak for the '60s. I can speak for the '70s. Yes.
Q. Who manufactured the asbestos tape that Balkamp sold?

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A. I do not know.
Q. Do you know who would know that?
A. I don't know. No, I would not know the individual at Balkamp that would have been responsible for that because it was so long ago.
Q. Now, you mentioned that Genuine Parts had a marketing division or a marketing and sales department?
A. Well, no, not Genuine Parts. Rayloc.
Q. Okay. That's my question. Are there separate departments or divisions for Rayloc and Genuine Parts?
A. Yes.
Q. What departments or divisions does Genuine Parts have?
A. Okay. As far as divisions, we are the Rayloc division. And within the Rayloc division, we have a sales force, and we have a marketing force.
Q. Does Rayloc have any other departments? They have a safety department, for example?
A. Yeah, we have a safety department.
Q. What other departments does Rayloc have?
A. Human resources, maintenance. That's it.
Q. Does Genuine Parts have its own departments, aside from Rayloc?
A. Yes.

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Q. For example, does Genuine Parts have its own human resources department?
A. Yes.
Q. Which one of the departments in Rayloc would the issue of workers' safety from exposure to asbestos fall under?
A. At what time period?
Q. It's changed?
A. At what time period?
Q. Okay. Let's start with 1960 forward. In 1960, who had responsibility for it?
A. I cannot speak on 1960. I can only speak from 1976.
Q. 1976, which department had primary responsibility for it?
A. Well, it wasn't a department. It was the general manager.
Q. At Genuine Parts, was there a corresponding person or department that would have primary responsibility for safety of workers at Rayloc for exposure to asbestos?
A. At what time period?
Q. Do you have any knowledge prior to 1976?
A. No, as far as -- prior to 1976, no.
Q. What knowledge do you have after 1976?