Page 10

to look at Exhibit A to that deposition, which are the areas of inquiry for today's deposition?
A. Yes.
Q. Were there any areas on that Notice of Deposition, Exhibit A, that you are unable to testify to today?
A. No.
Q. Is there anyone at Genuine Parts who is more knowledgeable about any particular area on Exhibit 1?
A. No.
Q. Is there anybody at Genuine Parts who is equally as knowledgeable as you are about any topic that's listed in the Notice of Deposition for today?
A. No.
Q. Is there anyone with whom you have consulted prior to today's deposition to obtain information for today's deposition?
MR. RILEY: Objection as to it inquires into attorney-client privilege. With the exception of counsel, he can answer.
THE WITNESS: No.
Q. (By Mr. Dumler) Are there any documents that you have reviewed in preparation for today's deposition?
A. Yes.
Q. What document have you reviewed?

Page 11

A. My personal.
Q. I'm sorry. Your personal file?
A. Uh-huh.
Q. Where do you keep your personal file?
A. In my office.
Q. What is contained in your personal file?
A. Correspondence.
Q. What –
MR. RILEY: If I can interrupt, were those documents produced?
THE WITNESS: Yes, all documents were turned over to legal.
Q. (By Mr. Dumler) Is the personal file that you maintain a file dealing with issues related to asbestos litigation? Is that why you maintained the file?
A. No. It's just a general file.
Q. When did you start keeping your personal file?
A. Ever since I worked at the company – well, ever since I've been in Atlanta.
Q. What year was that?
A. 1976.
Q. So the documents that were produced, I did see a notation that says "Paul LeCour's File." That's the file you reviewed yesterday; is that correct?
MR. RILEY: No. The file you reviewed

Page 12

yesterday.
Q. (By Mr. Dumler) I'm sorry. That's the file you reviewed in connection with today's deposition?
A. Yes.
Q. When did you review the document?
A. Several months ago.
Q. And you started that file when you began working in Atlanta?
A. Yes.
Q. What was the reason that you started keeping that particular file?
A. Because I wanted to know what had transpired over the years.
Q. So is this a file that's related specifically to Genuine Parts?
A. It's related to my business with Genuine Parts.
Q. When you say you wanted to know what transpired over the years, with respect to what issue?
A. All product lines.
Q. So anything that was related to a product line or an issue which you were dealing with, you would put in this particular file?
A. Yes.
Q. I'm going to also ask the court report to mark

Page 13

this Exhibit No. 2, which is Genuine Parts Company's Answers to the Plaintiff's Case-Specific Interrogatories.
(Plaintiffs' Exhibit LeCour 2 was marked.)
Q. (By Mr. Dumler) Mr. LeCour, if I could turn you to the back of this document, there's an exhibit which lists the deposition transcripts. And your name appears on there a couple of times.
My question is: Are there any depositions that you have given that do not appear on Attachment B to the Case-Specific Interrogatory Answers?
A. Yes.
Q. What other depositions have you given that are not on that Attachment B?
A. It was personal business.
Q. No other depositions related to Genuine Parts?
A. No.
Q. And the personal business did not relate to asbestos?
A. It did.
Q. How did it relate to asbestos?
A. It was a company-owned business. And we were called because there was a – they wanted to know if our company business ever used the products.
MR. RILEY: Clarify what company you're