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1 average mechanic, how they would go about grinding shoes
2 in their garage?

3 A. No. I've not seen grinding taking place in
4 a garage, in a repair garage.

5 See, jobbing stores -- the majority of your
6 jobbing operations had the grinding mechanisms, because
7 they turned the drums for the garage.

8 Q. You've never been to a garage to see
9 a mechanic do a brake job?

10 A. Oh, yes, absolutely.

11 Q. You've never seen a mechanic grind the brake?

12 A. No.

13 Q. What is your understanding of whether or not
14 your average mechanic would have these specific
15 specifications when they're grinding?

16 A. Give me that question again, please.

17 Q. Sure. Your average mechanic goes and buys
18 brake lining that they're going to grind. Is it your
19 understanding that they grind them to specific
20 specifications or that they grind them based upon their
21 view of what needs to be done to put them to properly
22 fit them with the drum?

23 MR. RILEY: Objection. Object to the form
24 of the question.

25 MR. ERRANTE: Objection.

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1 in the garages or not. I understand grinding, okay.

2 But I don't know what they did in the garages.

3 Q. Well, let me ask you this question: Do you
4 have an understanding of the difference between how you
5 put your product on an automobile and how you put some
6 of your competitors' products on an automobile with
7 respect to the grinding that needs to be done?

8 A. Well, ours is precision ground to fit. And
9 if they use someone else's brand that is not precision
10 ground -- because they had other people that are also
11 precision ground -- but if they do not, then they
12 couldn't get the drum back on. They could mount them,
13 but they'd never get the drum back on.

14 Q. What did they have to do to get the drum back on?

15 A. I don't know.

16 Q. Do you have any knowledge of how or why they
17 would go about grinding to apply a competitor's product?

18 A. The only way I can say it is, with the exhibit
19 that we just looked at from AMMCO, this company would
20 come in, and they would sell a garage this equipment.
21 And they would have to have the instructions of how to
22 use the equipment. So that's all I would know, follow
23 the instructions.

24 Q. Have you ever installed your own Rayloc brake
25 shoes?

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1 MR. DUMLER: Go ahead.

2 MR. RILEY: Those are not the only two
3 alternatives to what he may have in mind.

4 Q. (By Mr. Dumler) Are either of those
5 alternatives within your realm of understanding?

6 A. Repeat the question.

7 Q. What did you understand your average mechanic
8 was doing in order to get the brake linings to properly
9 fit?

10 MR. ERRANTE: Object to the form.

11 THE WITNESS: Using our product, they did
12 nothing other than install them.

13 Q. (By Mr. Dumler) Other than with respect to
14 your product, in those instances in which a mechanic at
15 a garage would grind brake shoes and lining, what was
16 your understanding of how they were going about doing
17 that and what they were doing?

18 MR. RILEY: Well, he's testified that he's
19 not seen it, so I don't know that he has an
20 understanding. Why don't you ask him if he has
21 an understanding.

22 Q. (By Mr. Dumler) Well, that is my question:
23 Do you have any idea what they're doing in the garages
24 when they're grinding brake shoes?

25 A. Well, I don't know if they are grinding them

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1 A. Absolutely, yes.

2 Q. Have you ever installed a competitor's brake
3 shoes?

4 A. Yes.

5 Q. Have you ever ground any linings? Have you
6 yourself ever ground brake linings?

7 A. Ground them in the plant before I took them
8 home and put them on the car.

9 Q. Have you ever ground them, not in the plant --
10 I'm sorry -- before you took them home for the car. So
11 the competitors' you've ground to go home, put them on
12 your car, and what, tested them?

13 A. Well, yes, if it required it.

14 Q. And what did you grind them to, specifications
15 or --

16 A. Yes.

17 Q. Where did you get the specifications?

18 A. American Brakeblok.

19 MR. DUMLER: Let me have that (indicating)
20 marked as the next exhibit.

21 (Plaintiffs' Exhibit LeCour 5 was marked.)

22 Q. (By Mr. Dumler) I've handed you what's been
23 marked as Exhibit 5, which appears to be an AMMCO
24 products catalog. Can you identify that for me?

25 A. It's tools and equipment for professionals.

16 (Pages 58 to 61)