Page 30

A. They did not have anyone responsible at Genuine Parts.
Q. What department at Rayloc would you consider to be primarily responsible for any dangers or hazards posed to the purchasers of Rayloc products due to asbestos?
A. Repeat that, please.
Q. Sure. What department at Rayloc do you believe had the primary responsibility for issues related to the hazards posed by asbestos to anyone who purchased a Rayloc product?
A. With our product, there were no hazards of exposure to asbestos. In our plant is where the hazards were.
Q. I'm asking you what department you considered to have primary responsibility for determining whether or not there were hazards?
A. That would have been the general manager.
Q. Of each plant?
A. Of each plant.
Q. So there would be no one at Rayloc who would oversee generally the decision of whether or not your products had potential hazards to users from asbestos?
A. When I arrived in 1976, they were performing industrial hygiene tests, monitors, with vacuum pumps on

Page 31

all workers that were exposed to asbestos. That was an ongoing thing. It was in place when I got there in '76, and it's still going on today.
That function was done by the insurance company. And the insurance company would work with our maintenance people. And our maintenance people would be the ones to calibrate the vacuum units and go out and work in conjunction with the insurance people.
Q. You indicated that your products were not hazardous to the individuals who used the products.
My question is: Who at Rayloc would be the person who would have ultimate authority for agreeing or disagreeing with you on that issue?
A. Well, I myself, being responsible for the processing of the product, knew that we were in compliance with OSHA and EPA. We in fact had it down to the level that we did not have to have annual chest x-rays, because we put in vacuum equipment, down-draft tables, to ensure that our employees were safe.
The product, when it went into the box, was considered good, as far as being safe and not having excessive dust in it.
The way I know that this product was safe is we had a classification return department and our re-box department. That department took the same product that

Page 32

went out in the box. It now came back to us. He had to open the box up, take the shoes out, look at them, making sure that they're all good, there's nothing wrong with them, put them back in the box. That person has been monitored. And we did not have down-draft tables in that area.
Q. We're going to get to all that. I'm just looking for – is the answer to my question: After 1976 –
A. Yes.
Q. – you were the person who would have been responsible for and made the determination that the products you were selling, brake shoes, brake pads, were safe for the users of those products?
A. No, I was not the person.
Q. Who was the person or department responsible for making that determination after 1976?
A. The general manager.
Q. Of each plant?
A. Yes.
Q. Prior to 1976, what person or department was responsible for making the determination that the products, brake shoes, brake pads sold by Rayloc were not hazardous to the users of those products?
A. The general managers.

Page 33

Q. Then after 1976, in your position in the engineering department, you would have had some interaction with the general managers with respect to that decision whether or not the products being sold by Genuine Parts were hazardous to the users?
A. That discussion never came up.
Q. But with respect to your job title, you would have had the ability to override their decision if you believed there was a hazard posed by the sale of your brake shoes or brake pads to the users?
A. Oh, I could have expressed that, but that was never an issue.
Q. Now, if you can turn to Exhibit 2, there's a list, Attachment A, on the Answers to Interrogatories.
Do you see that Attachment A to the Case-Specific Answers to Interrogatories?
A. Uh-huh.
Q. Can you tell me what that attachment signifies?
A. This is with the distribution center in South Plainfield, New Jersey. It has the jobber listing. And it's dated December 1st, 1972.
Q. What is the relationship between Genuine Parts and the jobbers that are listed on that schedule?
A. They are customers of the distribution center.