

APPENDIX 2-3

Lowe J PLAYED on 5_4 20151029 PA DC PCC on 5-2-17

Scene	Designation	Source	Tx Duration	Elapsed	Remains	Media File	Barcode
1	8:25-9:4	Lowe, Jill 2015-10-29 8:25 Q. All right. I'll get started. 9:1 Could you go ahead and, just for the record, 9:2 state and spell your full name. 9:3 A. Sure. It's Jill Lowe, J I L L, 9:4 L O W E.	00:00:12	00:00:00	00:39:32	Low_J-102915-1of:	M3.1
2	9:5-9:12	Lowe, Jill 2015-10-29 9:5 Q. And could you give us your business 9:6 address? 9:7 A. The -- I work out of my home 9:8 office. Would you like that address? 9:9 Q. If you're comfortable giving your 9:10 home office on the record. 9:11 A. Yeah. That's fine. It's 2071 9:12 Alexander Drive, Batavia, Illinois 60510.	00:00:15	00:00:12	00:39:20	Low_J-102915-1of:	M3.2
3	11:16-12:2	Lowe, Jill 2015-10-29 11:16 So just start with a little bit of 11:17 background. Where did you attend school? 11:18 A. College? 11:19 Q. College, yes. 11:20 A. University of Illinois, 11:21 Champaign-Urbana. 11:22 Q. And what year did you graduate? 11:23 A. 1993. 11:24 Q. And what degree? What area was 11:25 your degree in? 12:1 A. Business administration with a 12:2 concentration in marketing.	00:00:18	00:00:27	00:39:05	Low_J-102915-1of:	M3.3
4	12:15-13:15	Lowe, Jill 2015-10-29 12:15 Q. What was your first job after you 12:16 graduated college? 12:17 A. I was a sales assistant for General 12:18 Electric, the lighting division, out of Oak 12:19 Brook, Illinois. 12:20 Q. And what was the time period for 12:21 that, if you can remember? 12:22 A. I started in May of 1993 and was 12:23 there for six years. 12:24 Q. And where did you go from there? 12:25 A. From there, I went to Newell 13:1 Rubbermaid. And I was part of the Rubbermaid	00:01:01	00:00:45	00:38:47	Low_J-102915-1of:	M3.4

13:2 Home Products Division, and my role was a sales
 13:3 manager for Ace Hardware.
 13:4 Q. And how long were you there?
 13:5 A. Six years.
 13:6 Q. And what was the next position?
 13:7 A. Next I went to O'Sullivan
 13:8 Industries, which is a ready-to-assemble
 13:9 furniture company.
 13:10 Q. And what was your position there?
 13:11 A. Sales manager. I covered most of
 13:12 the Midwest area, predominantly the hardware
 13:13 home center channel.
 13:14 Q. How long were you there?
 13:15 A. A little under three years.

5	13:16 -13:19	Lowe, Jill 2015-10-29	00:00:13	00:01:46	00:37:46	Lowe_J-102915-1of:	M3.5
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13:16 Q. And what was your job after that?
 13:17 A. After that, I came to Danaher Tool
 13:18 Group, which now has become Apex Tool Group,
 13:19 and I have been here since about eight years.

6	13:20 -14:10	Lowe, Jill 2015-10-29	00:00:37	00:01:59	00:37:33	Lowe_J-102915-1of:	M3.6
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13:20 Q. Do you remember when Danaher became
 13:21 Apex?
 13:22 A. I don't recall the exact date of
 13:23 it, but -- and I should know that. I just
 13:24 can't recall right now, but, yeah. It was
 13:25 midyear, but in the time that I've been here.
 14:1 Q. Okay. And what was your position
 14:2 when you started at Danaher?
 14:3 A. When I started at Danaher, I was
 14:4 director of sales and I handled the Sears
 14:5 account for Danaher.
 14:6 Q. And did you have anyone that
 14:7 reported to you in that position?
 14:8 A. I did.
 14:9 Q. And who was your boss at the time?
 14:10 A. John Constantine.

7	15:10 -15:13	Lowe, Jill 2015-10-29	00:00:07	00:02:36	00:36:56	Lowe_J-102915-1of:	M3.91
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15:10 Q. Do you know John Constantine's
 15:11 title?
 15:12 A. He is president of North America
 15:13 Hand Tools for Apex Tool Group.

8	15:14 -15:25	Lowe, Jill 2015-10-29	00:00:33	00:02:43	00:36:49	Lowe_J-102915-1of:	M3.8
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15:14 Q. And I'm sure you do quite a few
 15:15 things, but, in general, what is your role as

15:16 the vice president of Apex?
 15:17 A. My role is to manage our Sears
 15:18 business; and underneath my responsibility
 15:19 would be sales, channel marketing, customer
 15:20 service, forecasting. I do work with another
 15:21 gentleman on the team -- the Apex team, that
 15:22 is -- with new product development. But I work
 15:23 kind of hand in hand with that person. And I'm
 15:24 responsible for anything that we do with Sears
 15:25 or who Sears sells to.

9	16:1 -16:14	Low e, Jill 2015-10-29	00:00:45	00:03:16	00:36:16	Low e_J-102915-1of:	M3.9
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16:1 Q. And who is the other person that
 16:2 you said you work with?
 16:3 A. The gentleman's name is Eric
 16:4 Broadaway. He would be over product.
 16:5 Q. So you're over the product -- or
 16:6 just to make sure I have it right,
 16:7 Mr. Broadaway is over the -- is it the Sears
 16:8 products?
 16:9 A. Eric Broadaway is in charge of all
 16:10 of our products that we sell with Apex, and
 16:11 that would be our national-branded product as
 16:12 well as any of our private label businesses.
 16:13 And that's where I work with him on what we are
 16:14 doing private label for Craftsman.

10	16:22 -16:24	Low e, Jill 2015-10-29	00:00:07	00:04:01	00:35:31	Low e_J-102915-1of:	M3.10
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16:22 Q. How long have you managed the Sears
 16:23 business?
 16:24 A. Roughly, eight years.

11	17:7 -18:7	Low e, Jill 2015-10-29	00:01:03	00:04:08	00:35:24	Low e_J-102915-1of:	M3.11
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17:7 What departments of Sears do you
 17:8 work with?
 17:9 A. We sell our products in the many
 17:10 different channels within Sears. I mean,
 17:11 predominantly I work with the tools division,
 17:12 but there's many buyers within the tools
 17:13 division that we would call on because of the
 17:14 products that we have to sell.
 17:15 In addition to that, I do work with
 17:16 what is called the KCB business, the Kenmore,
 17:17 Craftsman & Diehard business, their brand
 17:18 business. And in addition to that, there are
 17:19 many other channels within Sears that I will be
 17:20 involved with. So SHHO, which is Hometown

17:21 Hardware Outlets, the external channel --
 17:22 THE REPORTER: I'm sorry. SHHO,
 17:23 which is? It was just too fast for me.
 17:24 A. Pardon me. It is Hometown Hardware
 17:25 Outlets.
 18:1 THE REPORTER: Thank you.
 18:2 A. The external channel that sells to
 18:3 various customers that they deem they want to
 18:4 sell to. And then there's other channels, like
 18:5 AAFES, for example, which is the Army Exchange,
 18:6 international. I mean, there is a lot of
 18:7 different channels within Sears.

12 **24:21 -25:11** Lowe, Jill 2015-10-29 00:00:47 00:05:11 00:34:21 Lowe_J-102915-1of: M3.12

24:21 Q. This is Exhibit 2 --
 24:22 A. Yes.
 24:23 Q. -- titled, Plaintiff Loggerhead
 24:24 Tools, LLC Notice of 30(b)(6) -- Rule 30(b)(6)
 24:25 Deposition of Apex Tool Group, LLC?
 25:1 A. Mm-hmm.
 25:2 Q. Have you seen this document before?
 25:3 A. Again, let me just, if you don't
 25:4 mind, go through it.
 25:5 Q. Of course.
 25:6 A. Yes. I have seen this document.
 25:7 Q. Do you understand that counsel for
 25:8 Apex has designated certain of the topics
 25:9 listed in this document for you to testify
 25:10 about?
 25:11 A. Yes. Yes, I do.

13 **25:12 -25:17** Lowe, Jill 2015-10-29 00:00:24 00:05:58 00:33:34 Lowe_J-102915-1of: M3.13

25:12 Q. And my understanding is that
 25:13 this -- these topics are Topics 12, 14 to 15,
 25:14 19, 21, 25, 28 to 29, 31 to 34, and 37 to 39?
 25:15 A. I don't know specific. I know
 25:16 there's many that I need to testify, but I
 25:17 don't know the specific numbers.

14 **25:19 -26:9** Lowe, Jill 2015-10-29 00:00:57 00:06:22 00:33:10 Lowe_J-102915-1of: M3.14

25:19 MR. BLOCK: I can actually help
 25:20 with that, if it's helpful. So what we
 25:21 discussed and, you know, what we sent you was
 25:22 that Ms. Lowe would be testifying on behalf of
 25:23 Apex for Topics 12, 14 to 15, 19, 21, 25, 28 to
 25:24 29 --
 25:25 THE REPORTER: Wait. 14 to 15?

26:1 MR. BLOCK: -- 19, 21, 25, 28 to
 26:2 29, 31 to 34, and 37 to 39. And then for
 26:3 Topics 1, 35, and 46 to 47, Apex is designating
 26:4 Ms. Lowe to the extent those topics relate to
 26:5 the marketing of the Max Axess Locking Wrench,
 26:6 Apex's sales of the Max Axess Locking Wrench,
 26:7 financial information concerning revenues and
 26:8 costs associated with the Max Axess Locking
 26:9 Wrench, and Apex's relationship with Sears.

15	26:10 -26:13	Low, Jill 2015-10-29	00:00:10	00:07:19	00:32:13	Low_J-102915-1of:	M3.15
		26:10 Q. Ms. Lowe, is that your 26:11 understanding, that these are the topics that 26:12 you're prepared to testify about on behalf of 26:13 Sears? I apologize. On behalf of Apex?					
16	26:14 -26:14	Low, Jill 2015-10-29	00:00:01	00:07:29	00:32:03	Low_J-102915-1of:	M3.16
		26:14 A. On behalf of Apex, yes.					
17	29:9 -29:25	Low, Jill 2015-10-29	00:00:39	00:07:30	00:32:02	Low_J-102915-1of:	M3.17
	Link > P119.1	29:9 Q. So I'll have you look at Exhibit 4, 29:10 which has the Bates number Apex 7774. Do you 29:11 see that document? 29:12 A. Yes, I do. 29:13 Q. And do you recognize this e-mail 29:14 chain? 29:15 A. Yes, I do. Link > P119.1.1 29:16 Q. And the bottom e-mail is an e-mail 29:17 from Matthew McDonnell to you? 29:18 A. Actually, Matt McDonnell. 29:19 Q. Oh, I apologize. Matt McDonnell to 29:20 you. And this is dated February 22, 2012? 29:21 A. Yes. 29:22 Q. Is this the e-mail that you were 29:23 referring to about the first communication that 29:24 you heard about the Max Axess Locking Wrench? 29:25 A. Yes, that is correct.					
18	30:1 -30:5	Low, Jill 2015-10-29	00:00:16	00:08:09	00:31:23	Low_J-102915-1of:	M3.18
		30:1 Q. And you mentioned that this was the 30:2 first e-mail you received about the Max Axess 30:3 Locking Wrench. Had you heard about the 30:4 project before this e-mail? 30:5 A. To the best of my knowledge, no.					
19	30:6 -31:1	Low, Jill 2015-10-29	00:01:02	00:08:25	00:31:07	Low_J-102915-1of:	M3.19
		30:6 Q. Who is Mr. McDonnell? 30:7 A. Matt McDonnell, at the time, was on 30:8 the KCD team, and he was responsible for the					

30:9 Craftsman-branded product and he was the
 30:10 director of hand tools. So the product in
 30:11 question would have been under his
 30:12 responsibility.
 30:13 Q. Do you see that he says, We may
 30:14 have an opportunity on Bionic 2.0?
 30:15 A. Yes.
 30:16 Q. What did you understand him to mean
 30:17 by that?
 30:18 A. My understanding of that was that
 30:19 he wanted to talk to Apex about creating a new
 30:20 product that would basically have features and
 30:21 benefits that would be unique to the Craftsman
 30:22 brand.
 30:23 Q. At this time, did you know what
 30:24 product Bionic 2.0 referred to?
 30:25 A. I did. I knew what the Loggerhead
 31:1 Bionic tool was, yes.

20	31:11 -31:16	Lowe, Jill 2015-10-29	00:00:16	00:09:27	00:30:05	Lowe_J-102915-1of:	M3.20
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31:11 Q. Sure. So you understood the Bionic
 31:12 2.0 to be a reference to the Loggerhead Bionic
 31:13 Wrench?
 31:14 A. I understood that Bionic 2.0 was
 31:15 basically them -- them, meaning the KCD team --
 31:16 asking Apex to look at a new product.

21	31:17 -33:12	Lowe, Jill 2015-10-29	00:01:55	00:09:43	00:29:49	Lowe_J-102915-1of:	M3.21
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31:17 Q. What did you understand that this
 31:18 new product relationship would be with the
 31:19 Loggerhead Bionic Wrench?
 31:20 A. My understanding on that is the new
 31:21 product would be something that would kind of
 31:22 be a next generation of a tool that was out in
 31:23 the marketplace, and it would be a competitive
 31:24 tool that would have unique features and
 31:25 benefits to it that would offer an advantage to
 32:1 Craftsman over any tool that existed in the
 32:2 marketplace.
 32:3 Q. And you mentioned that you were
 32:4 aware of Loggerhead's Bionic Wrench in the
 32:5 marketplace?
 32:6 A. I was, yes.
 32:7 Q. Do you recall how you became aware
 32:8 of the product?
 32:9 A. I'm in Sears' stores all of the
 32:10 time and that product was in the store.

32:11 Typically, as a sales manager, you're going to
 32:12 walk the store and see what product is out
 32:13 there just to see what, you know, that customer
 32:14 is doing in the marketplace, so I saw it on one
 32:15 of my store visits.
 32:16 Q. Is it common for Apex to create a
 32:17 next generation of a tool that's out in the
 32:18 marketplace?
 32:19 A. It's very common for Apex to work
 32:20 with the KCD team on brain innovation. It
 32:21 doesn't necessarily mean it has to be next
 32:22 generation of anything, but it's just
 32:23 innovation within hand tools. We have proven
 32:24 history of many products that we have done with
 32:25 the KCD team to do that.
 33:1 Q. Have some of these products been
 33:2 next generation -- a next generation of a tool
 33:3 that was out in the marketplace?
 33:4 A. I will tell you that many ideas
 33:5 come from tools that have been in the
 33:6 marketplace since the 1940s. I mean, a lot of
 33:7 innovation is kind of based off things that had
 33:8 been done before, but you're just doing it
 33:9 different and better and adding different
 33:10 features and benefits to it. So we have
 33:11 brought many different types of products to the
 33:12 marketplace under the Craftsman brand.

22	54:19 -54:24	Low e, Jill 2015-10-29	00:00:26	00:11:38	00:27:54	Low e_J-102915-1of:	M3.27
		54:19 Q. I'm trying to find the place. The 54:20 stamp interferes with the text. I've 54:21 introduced, as Exhibit 8 -- the stamp is kind 54:22 of in the middle of the document here -- a 54:23 two-page document with the Bates number on the 54:24 first page being Sears 405.					
23	55:14 -55:19	Low e, Jill 2015-10-29	00:00:17	00:12:04	00:27:28	Low e_J-102915-1of:	M3.28
		55:14 Q. And it looks like the e-mail, at 55:15 the top of the page, Mr. Pope is responding to 55:16 your e-mail by annotating your e-mail; is that 55:17 correct? 55:18 A. He basically is responding and 55:19 putting his answers in red in my text.					
24	56:9 -57:3	Low e, Jill 2015-10-29	00:00:49	00:12:21	00:27:11	Low e_J-102915-1of:	M3.29
		56:9 Q. -- under Bionic Wrench, it says -- 56:10 I guess, Mr. Pope says, Huge interest. Can you					

56:11 work miracles and get this in time for Q4?
 56:12 It's good to reach for the stars. Do you see
 56:13 that?
 56:14 A. Yes, I do.
 56:15 Q. Did Mr. Pope explain why there was
 56:16 a huge interest?
 56:17 A. The -- just so you know, this is
 56:18 the same e-mail that we just looked at on the
 56:19 previous page when I referenced that, and this
 56:20 is Barry's response to me at this point in
 56:21 time. This was not a surprise to me because I
 56:22 had already had a conversation with Matt
 56:23 McDonnell stating that he wanted this item for
 56:24 Q4 and the quantity would be 175,000 units.
 56:25 That was a conversation I had with
 57:1 Matt. And Barry is just kind of reiterating
 57:2 that, yes, this is something that we want for
 57:3 Q4.

25	57:4-57:22	Lowe, Jill 2015-10-29	00:00:50	00:13:10	00:26:22	Lowe_J-102915-1of:	M3.96
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57:4 Q. Did it surprise you that he
 57:5 asked -- or that he thought it would take
 57:6 working miracles to get this in time for Q4?
 57:7 A. No. And the reason being is when
 57:8 we looked to launch new products with the
 57:9 Craftsman brand team, there is a certain time
 57:10 line that we normally would follow. This did
 57:11 come up rather late in the game in order to hit
 57:12 a Q4. It typically takes, roughly, about seven
 57:13 months to launch a new product.
 57:14 So this is one where they did say,
 57:15 you know, that's why he's putting a note in
 57:16 there it's good to reach for the stars, because
 57:17 this would be within that time frame. Have we
 57:18 launched products earlier than seven months
 57:19 before? Absolutely. But, you know, that's
 57:20 just kind of when we go in and talk new
 57:21 products, we kind of start with that and say
 57:22 this is typically how long it would take.

26	60:18-61:9	Lowe, Jill 2015-10-29	00:00:47	00:14:00	00:25:32	Lowe_J-102915-1of:	M3.30
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[Link > P495.1](#)

60:18 Q. I've introduced, as Exhibit 10 --
 60:19 A. Mm-hmm.
 60:20 Q. -- a four-page e-mail beginning
 60:21 with Bates number Apex 2293?
 60:22 A. Yes, I see that.
 60:23 Q. If you turn to the last e-mail of

[Link > P495.4.1](#)

60:24 the chain, so looking at page 4 --
 60:25 A. Mm-hmm.
 61:1 Q. -- this is an e-mail from Mark Good
 61:2 to quite a few people, including you, correct?
 61:3 A. Yes.
 61:4 Q. And that's on March 23rd, 2012?
 61:5 A. Yes.
 61:6 Q. Who is Mark Good?
 61:7 A. Mark Good was the manager of
 61:8 industrial design that worked for the KCD
 61:9 Brands team.

27 **62:5-62:12** Lowe, Jill 2015-10-29 00:00:22 00:14:47 00:24:45 Lowe_J-102915-1of: M3.31

[Link > P495.1.2](#)

62:5 Q. I'll start over. It says, Mark, I
 62:6 am sorry. We removed the lighted adjustable
 62:7 from development for Craftsman and have not
 62:8 generated more designs. We have been focused
 62:9 now on the Eclipse and Bionic replacement
 62:10 completing those design attempts so we can try
 62:11 and meet Quarter 4. Do you see that?
 62:12 A. Mm-hmm. Yes, I do.

28 **63:4-63:21** Lowe, Jill 2015-10-29 00:00:51 00:15:09 00:24:23 Lowe_J-102915-1of: M3.32

63:4 Q. Were there any items that had to be
 63:5 pushed out to get -- in order to work on the
 63:6 Bionic 2.0?
 63:7 A. There was an item that was on the
 63:8 table at one point. In this e-mail, it states,
 63:9 We removed the lighted adjustable from
 63:10 development and generated more designs.
 63:11 we've been more focused on Eclipse and the
 63:12 Bionic.
 63:13 I can let you know what was
 63:14 launched in fourth quarter of 2012, and that
 63:15 was the Max Axess Locking Wrench along with a
 63:16 lighted adjustable wrench. The Eclipse
 63:17 Multitool did get pushed out until 2013, but a
 63:18 lot of that had to do with the design of the
 63:19 product. The KCD team was not happy with what
 63:20 was being proposed, so that got moved to launch
 63:21 the next year.

29 **103:14-103:17** Lowe, Jill 2015-10-29 00:00:13 00:16:00 00:23:32 Lowe_J-102915-2of: M3.34

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103:14 Q. I've introduced a new document as
 103:15 Exhibit 22. That Apex -- that has the Bates
 103:16 number, on the first page, of Apex 9011, and
 103:17 it's a three-page document.

30	104:5 -104:9	Low e, Jill 2015-10-29	00:00:09	00:16:13	00:23:19	Low e_J-102915-2of:	M3.35
		104:5 Q. -- it's from Eric Broadaway to					
		104:6 several others copying you?					
		104:7 A. Yes.					
		104:8 Q. And this is from May 9th, 2012?					
		104:9 A. Mm-hmm.					
31	104:21 -104:24	Low e, Jill 2015-10-29	00:00:07	00:16:22	00:23:10	Low e_J-102915-2of:	M3.36
		104:21 Q. And he goes on that we had design					
		104:22 changes from Craftsman on both of these as					
		104:23 little as three weeks ago.					
		104:24 A. Mm-hmm.					
32	106:3 -107:15	Low e, Jill 2015-10-29	00:01:55	00:16:29	00:23:03	Low e_J-102915-2of:	M3.37
		106:3 Q. He then says that we think Sears					
		106:4 pays about \$9.50 for the 8-inch Bionic, but					
		106:5 maybe less. Do you see that?					
		106:6 A. I do.					
		106:7 Q. Was this your view as well?					
		106:8 A. I don't know specifically the exact					
		106:9 price. I do know that I had had conversations					
		106:10 with Stephanie Kaleta related to kind of					
		106:11 generalities of what they were paying for					
		106:12 certain products. And that, too, is not -- I					
		106:13 mean, it's very normal that that comes in the					
		106:14 discussion when you're getting ready to price a					
		106:15 product to them.					
		106:16 Q. Had she told you, in any --					
		106:17 generally or specifically, what Sears was					
		106:18 paying for the Loggerhead Bionic Wrench?					
		106:19 A. I do recall that I did have a					
		106:20 conversation with her at one point that I					
		106:21 believe I put in an e-mail to other folks					
		106:22 within the company that gave me guidance on,					
		106:23 yes, what her existing pricing was, or a range					
		106:24 of her existing pricing, right.					
		106:25 Q. Did Ms. Kaleta explain why she was					
		107:1 telling you the existing pricing range?					
		107:2 A. I don't know if she specifically					
		107:3 said this is why I'm telling you this, but it					
		107:4 has more to do with what their margin					
		107:5 expectations would be for new product and,					
		107:6 again, very normal in the negotiation time					
		107:7 period whenever you're quoting anything new to					
		107:8 a customer.					
		107:9 Q. So she is telling you what her					
		107:10 current margins are and basically saying that					

107:11 you all would need to match that or beat it?
 107:12 A. She would be giving us guidance as
 107:13 to, Here is where I'm relatively around today
 107:14 and here is where I would hope to be at
 107:15 tomorrow.

33 107:16-109:15 Lowe, Jill 2015-10-29 00:02:15 00:18:24 00:21:08 Lowe_J-102915-2of: M3.38

107:16 Q. And Mr. Broadway goes on and says,
 107:17 The Craftsman -- and, again, this is the
 107:18 Craftsman -- what became the Craftsman --
 107:19 A. Yep.
 107:20 Q. -- Locking -- or Max Axess Locking
 107:21 Wrench.
 107:22 A. Okay.
 107:23 Q. So he said, The Craftsman has
 107:24 dual-material handles and a locking ring
 107:25 feature above the dipped handle, nonlocking
 108:1 Bionic. Do you see that?
 108:2 A. I do.
 108:3 Q. Did you view this as him saying
 108:4 that these are improvements over the Loggerhead
 108:5 Bionic Wrench?
 108:6 A. I view this as the Apex team
 108:7 providing to the KCD team a product that has
 108:8 different features and benefits that are not in
 108:9 the marketplace today. So similar type
 108:10 products did not have a locking feature, so
 108:11 that definitely was a competitive advantage for
 108:12 Craftsman, which is really the intent of this
 108:13 opportunity.
 108:14 Q. Did you view the dual material
 108:15 handles also as a competitive advantage?
 108:16 A. We would view that, yes, because
 108:17 it's a much more comfortable grip in your hand.
 108:18 Q. Were there any other distinguishing
 108:19 features of the Bionic 2.0 over the Loggerhead
 108:20 Bionic Wrench?
 108:21 A. In addition to having the locking
 108:22 feature and the dual-material handles, there
 108:23 were also some -- and this -- I may not be
 108:24 naming them all, but this is just what I
 108:25 remember.
 109:1 On the Max Axess adjustable wrench,
 109:2 there are arrows that talk to how to do the
 109:3 locking mechanism. There was also a scale
 109:4 range so that when you're adjusting it, you

109:5 would know exactly what size you are. One side
 109:6 was inch. The other side was a metric scale.
 109:7 So that was also an added feature to that
 109:8 product.
 109:9 There may be more, but those are
 109:10 really the four that I remember the most. I
 109:11 mean, the look of the product, too, was
 109:12 different just from a standpoint of how the
 109:13 head moved to get to the different sizes. So,
 109:14 you know, visually it was a different-looking
 109:15 product.

34 **111:13 -111:15** Lowe, Jill 2015-10-29 00:00:09 00:20:39 00:18:53 Lowe_J-102915-2of: M3.39
[Link > P350.1](#)
 111:13 Q. And I'm marking, as Exhibit 23, a
 111:14 two-page document with Bates numbers Sears 311
 111:15 on the first page.

35 **112:17 -112:19** Lowe, Jill 2015-10-29 00:00:05 00:20:48 00:18:44 Lowe_J-102915-2of: M3.40
[Link > P350.1.1](#)
 112:17 Q. And so the subject is, Price Quote
 112:18 For Craftsman 4Q Innovation from Apex?
 112:19 A. Yes.

36 **113:1 -113:6** Lowe, Jill 2015-10-29 00:00:12 00:20:53 00:18:39 Lowe_J-102915-2of: M3.41
[Link > P350.1.2](#)
 113:1 Q. It says, We are able to quote both
 113:2 an 8-inch and 6-inch Max Axess wrench. I know
 113:3 we had only been talking about the 8-inch
 113:4 before. We can deliver both sizes for 4Q.
 113:5 Do you see that?
 113:6 A. I do.

37 **113:22 -114:4** Lowe, Jill 2015-10-29 00:00:19 00:21:05 00:18:27 Lowe_J-102915-2of: M3.42
 113:22 Q. So sometime between the e-mails we
 113:23 saw earlier and the March time frame where you
 113:24 were uncertain as to whether you could get the
 113:25 Bionic 2.0 delivered for fourth quarter 2012
 114:1 and now things have changed and Apex now knows
 114:2 it can deliver the product for fourth quarter
 114:3 2012?
 114:4 A. Based on this e-mail, yes.

38 **120:21 -120:23** Lowe, Jill 2015-10-29 00:00:11 00:21:24 00:18:08 Lowe_J-102915-2of: M3.47
[Link > P132.1](#)
 120:21 Q. And I've introduced, as Exhibit 25,
 120:22 a two-page document with -- beginning with a
 120:23 Bates number Apex 9334.

39 **122:8 -122:23** Lowe, Jill 2015-10-29 00:00:34 00:21:35 00:17:57 Lowe_J-102915-2of: M3.48
[Link > P132.1.1](#)
 122:8 Q. So you go on and say, Their old
 122:9 price, on the Bionic Wrench from Loggerhead,
 122:10 was in the no -- low nine-dollar range, landed

122:11 USA. That's why they asked for a cost of 9 to
 122:12 \$10. Do you see that?
 122:13 A. I do.
 122:14 Q. Is this what you were referring to
 122:15 earlier in the e-mail that reflected the
 122:16 discussion you had with Ms. Kaleta on what
 122:17 their pricing for the Loggerhead Bionic Wrench
 122:18 was?
 122:19 A. I believe I had recalled having a
 122:20 conversation with Stephanie where I got some
 122:21 information, and I remember putting it in an
 122:22 e-mail. And this is the e-mail that I was
 122:23 referring to, yes.

40	123:8 -123:22	Low e, Jill 2015-10-29	00:00:36	00:22:09	00:17:23	Low e_J-102915-2of:	M3.49
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[Link > P132.1.2](#)

123:8 Q. And then, in the next paragraph,
 123:9 you say, Stephanie feels like she needs to be
 123:10 at least where they are today for a landed
 123:11 price, meaning around 10.50. We quoted 11.15.
 123:12 She stated we need to be at least one dollar
 123:13 off their current landed price of 11.71. Do
 123:14 you see that?
 123:15 A. I do.
 123:16 Q. Did Ms. Kaleta explain why they
 123:17 needed to be at least a dollar off of their
 123:18 current landed price of 11.71?
 123:19 A. Again, I would have to remember the
 123:20 conversation exactly, but my assumption would
 123:21 be that she has a margin goal that she wanted
 123:22 to meet for this product.

41	124:24 -125:18	Low e, Jill 2015-10-29	00:00:46	00:22:45	00:16:47	Low e_J-102915-2of:	M3.50
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[Link > P132.1.3](#)

124:24 Q. And if you go on to Item No. C, it
 124:25 says, She understands there is a lot more to
 125:1 this wrench, meaning locking feature and
 125:2 cushion grip handle, but she also knows this is
 125:3 made in Asia versus the Loggerhead that is made
 125:4 in the USA. Do you see that?
 125:5 A. I do.
 125:6 Q. What did you mean by, But she also
 125:7 knows this is made in Asia versus the
 125:8 Loggerhead that is made in USA?
 125:9 A. Typically, when buyers are looking
 125:10 at product that is made in Asia versus made in
 125:11 USA, they feel that the cost of the product is
 125:12 going to be cheaper. So looking at this
 125:13 e-mail, what I think was going through her mind

125:14 was, yes, I understand that there are
 125:15 definitely more features and benefits to this
 125:16 product; but at the same time, your costs
 125:17 should be less because you're making it in
 125:18 Asia, not USA.

42 **130:8 -130:16** Lowe, Jill 2015-10-29 00:00:26 00:23:31 00:16:01 Lowe_J-102915-2of: M3.51

[Link > P352.1](#)

130:8 Q. I've introduced, as Exhibit 27, a
 130:9 four-page document beginning with the Bates
 130:10 number Sears 318.
 130:11 A. 318, yes, I see that.
 130:12 Q. Okay. And this is an e-mail from
 130:13 you to Ms. Kaleta and others; is that right?
 130:14 A. Yes, it is.
 130:15 Q. And that's on May 16th, 2012?
 130:16 A. Yes, it is.

43 **133:7 -133:14** Lowe, Jill 2015-10-29 00:00:18 00:23:57 00:15:35 Lowe_J-102915-2of: M3.52

[Link > P352.1.4](#)

133:7 Q. Okay. So it says, We now know we
 133:8 can bring the handles closer together without
 133:9 losing fastener-range fitness. We plan for the
 133:10 new handle width on the 8-inch to be 120
 133:11 millimeters or 4.75 inches. This is the same
 133:12 handle width as the Loggerhead 8-inch. Do you
 133:13 see that?
 133:14 A. I do.

44 **133:15 -134:1** Lowe, Jill 2015-10-29 00:00:30 00:24:15 00:15:17 Lowe_J-102915-2of: M3.93

133:15 Q. Why did you explain to Ms. Kaleta
 133:16 that the new handle range or the new handle
 133:17 width is the same handle width as the
 133:18 Loggerhead 8-inch?
 133:19 A. Going back to my original
 133:20 conversation with her on the handle width, in
 133:21 order for her to fully understand what that
 133:22 width would be, at this point in time, she
 133:23 didn't have a prototype sample. So I was
 133:24 referencing another product that she could
 133:25 actually put her hands on to feel what that
 134:1 width would be.

45 **134:13 -134:15** Lowe, Jill 2015-10-29 00:00:06 00:24:45 00:14:47 Lowe_J-102915-2of: M3.53

134:13 Q. Do you know why Apex chose to
 134:14 change its handle width to be the same as the
 134:15 Loggerhead 8-inch?

46 **134:19 -134:25** Lowe, Jill 2015-10-29 00:00:22 00:24:51 00:14:41 Lowe_J-102915-2of: M3.54

134:19 A. What the request was, from
 134:20 Stephanie Kaleta to us in the brand team, was

134:21 basically this handle is too wide and it needs
 134:22 to be decreased. So we worked to determine the
 134:23 smallest width that we could decrease it to
 134:24 without altering the range size that we had
 134:25 quoted to them initially.

47 **137:20 -137:24** Lowe, Jill 2015-10-29 00:00:12 00:25:13 00:14:19 Lowe_J-102915-2of: M3.57

137:20 Q. Do you remember what the final
 137:21 pricing was?
 137:22 A. I believe I do, but let's
 137:23 double-check this. But I believe the 8-inch
 137:24 was \$10 and the 6-inch was \$9.

48 **138:3 -138:4** Lowe, Jill 2015-10-29 00:00:04 00:25:25 00:14:07 Lowe_J-102915-2of: M3.58

138:3 A. I know I have the document, and
 138:4 I -- from my memory, I recall that's the price.

49 **138:16 -138:18** Lowe, Jill 2015-10-29 00:00:11 00:25:29 00:14:03 Lowe_J-102915-2of: M3.59

[Link > P142.5](#) 138:16 Q. This is Exhibit 29, and it is an
 138:17 11-page document beginning with Bates number
 138:18 Apex 13362.

50 **138:24 -139:7** Lowe, Jill 2015-10-29 00:00:19 00:25:40 00:13:52 Lowe_J-102915-2of: M3.60

138:24 Q. At the top, it says, Annual Sales
 138:25 Forecast COGS, GM. Do you see that?
 139:1 A. I do see that, yes.
 139:2 Q. Do you know what COGS is?
 139:3 A. Cost of goods sold.
 139:4 Q. And then do you know what the GM
 139:5 and dollar sign is?
 139:6 A. It would be gross margin stated in
 139:7 dollars.

51 **153:16 -153:16** Lowe, Jill 2015-10-29 00:00:02 00:25:59 00:13:33 Lowe_J-102915-2of: M3.61

[Link > P346.1](#) 153:16 Q. And I've introduced Exhibit 31. I

52 **155:9 -156:11** Lowe, Jill 2015-10-29 00:01:18 00:26:01 00:13:31 Lowe_J-102915-2of: M3.94

[Link > P346.4.1](#) 155:9 Q. And you say, Both the Max Axess AW
 155:10 and the Eclipse Multitool are laminate tools.
 155:11 The punch presses to make the plates are shared
 155:12 between these tools. Plates are the layers of
 155:13 steel riveted together. The Type --
 155:14 THE REPORTER: I'm sorry. Plates
 155:15 are the layers?
 155:16 Q. Plates are the layers of steel
 155:17 riveted together. The type of machine used to
 155:18 make the plates is called a press. So in order
 155:19 to keep presses running for Max Axess AW plates
 155:20 to hit these fourth quarter buy quantities, we

155:21 would not be able to also do the Eclipse. I
 155:22 hope this will be acceptable. Do you see that?
 155:23 A. Yes, I do.
 155:24 Q. Is this what you were referring to
 155:25 earlier when you were saying that you were
 156:1 having to push the Eclipse into 2013?
 156:2 A. That is correct.
 156:3 Q. And so here you're saying it's
 156:4 because the Eclipse and the Max Axess can't run
 156:5 simultaneously since they use the same plates
 156:6 for tooling; is that right?
 156:7 A. Yeah. Basically, what we were
 156:8 saying is, we needed to have all of the presses
 156:9 running to run this volume on the Max Axess
 156:10 Adjustable Wrench for the quantities that
 156:11 Stephanie had requested.

[Link > Hide](#)

53	156:12 -156:16	Low e, Jill 2015-10-29	00:00:15	00:27:19	00:12:13	Low e_J-102915-2of:	M3.64
		156:12 Q. Why did Apex decide to move the 156:13 Eclipse to 2013 and fulfill the entire Max 156:14 Axess Adjustable Wrench order instead of 156:15 decreasing the Max Axess Adjustable Wrench 156:16 order and still doing the Eclipse Multitool?					
54	156:20 -157:11	Low e, Jill 2015-10-29	00:00:48	00:27:34	00:11:58	Low e_J-102915-2of:	M3.65
		156:20 A. First of all, Apex doesn't decide 156:21 what to do. That decision comes from the KCD 156:22 team. So what we provide is, to the KCD and 156:23 the Sears team, we say, In order to get the 156:24 quantity you want on this product, that means 156:25 that this other product we can't do. It is up 157:1 to you guys to decide what you would like us to 157:2 proceed with. So that decision ultimately came 157:3 from that team. 157:4 Q. And the KCD team decided to go with 157:5 the full order on the Max Axess Adjustable 157:6 Wrench and move the Eclipse into 2013? 157:7 A. From a product decision, yes. I 157:8 mean, obviously, they were having conversations 157:9 with the Sears Full Line Team, too, on what 157:10 they would want to purchase; but yes, that 157:11 decision came to us from the KCD team.					
55	167:5 -167:6	Low e, Jill 2015-10-29	00:00:08	00:28:22	00:11:10	Low e_J-102915-2of:	M3.95
		167:5 Q. Do you know if it's standard for 167:6 Apex to conduct tests on non-Apex products?					

56	167:14 -167:16	Low e, Jill 2015-10-29	00:00:12	00:28:30	00:11:02	Low e_J-102915-2of:	M3.67
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167:14 A. Yes. We -- it is very typical for
 167:15 Apex to test a lot of products in the
 167:16 marketplace. That's not uncommon.

57 **167:17 -168:16** Lowe, Jill 2015-10-29 00:01:03 00:28:42 00:10:50 Lowe_J-102915-2of: M3.68

167:17 Q. And for what purpose?
 167:18 A. Typically, from a purpose to see
 167:19 how well the tools perform. And a lot of times
 167:20 that's used -- that is used to benchmark
 167:21 against a Craftsman spec to see how the tool
 167:22 would perform the Craftsman spec, because every
 167:23 tool that Craftsman will put their name on must
 167:24 meet a spec that they define.
 167:25 Q. When you say benchmark against a
 168:1 Craftsman spec, is that a preexisting Craftsman
 168:2 spec or do you mean to create a Craftsman spec?
 168:3 A. Typically, any -- or I should say,
 168:4 any Craftsman spec needs to be determined by
 168:5 the KCD brand team, and then they would share
 168:6 that with any manufacturer that would want to
 168:7 manufacture any of their products.
 168:8 If a spec does not exist, let's
 168:9 say, on an item, they might work with the
 168:10 individual vendor, which would be us, to
 168:11 determine and help them determine what that
 168:12 spec may be. But a lot of times they already
 168:13 have a spec that exists that they would just
 168:14 pass to us and say if you want to make a
 168:15 Craftsman adjustable wrench, this is the spec
 168:16 you need to hit.

58 **187:2 -187:13** Lowe, Jill 2015-10-29 00:00:34 00:29:45 00:09:47 Lowe_J-102915-2of: M3.72

187:2 Q. And if you go to the next page,
 187:3 Item No. 2, he says, The root cause in a bigger
 187:4 picture. This project started late with huge
 187:5 quantities and high technical difficulty.
 187:6 A. Yes, I see that.
 187:7 Q. And then down in the next item, he
 187:8 said that the total quantities this year of
 187:9 320,000 pieces is way more than any other
 187:10 projects?
 187:11 A. Yes, I see that.
 187:12 Q. Do you agree that this was a huge
 187:13 quantity for an order from Sears to Apex?

59 **187:17 -188:11** Lowe, Jill 2015-10-29 00:01:13 00:30:19 00:09:13 Lowe_J-102915-2of: M3.73

187:17 A. Okay. Like I had mentioned before,

187:18 we do a lot of volume with Sears on certain
 187:19 items. But based on the fact that this was
 187:20 developed a little bit later, you know, having
 187:21 that amount of quantity that you have to
 187:22 produce in a given amount of time to ship, this
 187:23 would be a large number of pieces.
 187:24 Q. Did Sears ever explain why they
 187:25 wanted such a large order even though there was
 188:1 a shorter time frame?
 188:2 A. I mean, in their -- in their mind,
 188:3 based on my conversations, again, with
 188:4 Stephanie Kaleta, this is an item that they
 188:5 wanted for DRTV. So the volume was driven by
 188:6 their DRTV plans. And they had a lot of
 188:7 history on items that they've run on DRTV in
 188:8 the past, and that's where they get their
 188:9 volume estimates from. But this type of volume
 188:10 they would never buy unless they were going to
 188:11 put it on DRTV.

60	188:12-189:2	Lowe, Jill 2015-10-29	00:00:46	00:31:32	00:08:00	Lowe_J-102915-2of:	M3.74
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188:12 Q. Did Ms. Kaleta ever explain to you
 188:13 why she wanted this product on DRTV?
 188:14 A. Thinking back to some conversations
 188:15 with her, I think it came down to the fact that
 188:16 they just believed in the item. They liked the
 188:17 fact that it was innovative and was offering a
 188:18 different feature benefit to the customer
 188:19 that's not out in the marketplace today.
 188:20 Obviously, with the negotiation on the price,
 188:21 they liked that it hit the twenty-dollar price
 188:22 point. And they have a lot of history with how
 188:23 do items run on DRTV when it's \$20 or below.
 188:24 So I think that, in itself, was
 188:25 something that, you know, the Sears Full Line
 189:1 Team, beyond Stephanie, just really believed in
 189:2 that they would be able to sell this product.

61	232:23-233:6	Lowe, Jill 2015-10-29	00:00:36	00:32:18	00:07:14	Lowe_J-102915-3of:	M3.76
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232:23 Q. If you want to back out of that
 Link > P149.1 232:24 one, I've introduced, as Exhibit 53, a two-page
 232:25 document beginning with Bates number Apex
 233:1 17569?
 233:2 A. Yes.
 233:3 Q. And this is an e-mail chain with
 Link > P149.1.1 233:4 the top e-mail being from you to Ms. Kaleta and
 233:5 others?

233:6 A. Yes.

62 **233:7 -233:19** Lowe, Jill 2015-10-29 00:00:27 00:32:54 00:06:38 Lowe_J-102915-3of: M3.77

233:7 Q. One of the recipients is Aaron
 233:8 Wits, who you've just described, and the other
 233:9 is Tom Arvia?
 233:10 A. Yes.
 233:11 Q. Who is Tom Arvia?
 233:12 A. Tom Arvia, at the time, was the
 233:13 DMM, department merchandise manager, that was
 233:14 responsible for mechanics hand tools. He was
 233:15 not over general purpose tools. Stephanie
 233:16 Kaleta reported in to a different individual.
 233:17 Q. Was Tom Arvia at Sears?
 233:18 A. Yes. He was part of the Sears Full
 233:19 Line Team.

63 **233:20 -235:16** Lowe, Jill 2015-10-29 00:02:01 00:33:21 00:06:11 Lowe_J-102915-3of: M3.78

233:20 Q. So in this e-mail, you're writing
 233:21 to Stephanie and you say, The other call out
 233:22 that I have for the script is I think we need
 233:23 to make a call out on the number or fasteners
 233:24 the tool can be used on. In the script, it
 233:25 states the following: It does the work of two
 234:1 sets of wrenches, metric and standard, so you
 234:2 spend less time looking for tools and more time
 234:3 getting things done. But can we quantify the
 234:4 number of wrench sizes? I think we need to
 234:5 just like we added to the packaging.
 234:6 Do you see that?
 234:7 A. Yes.
 234:8 Q. When you say just like we added to
 234:9 the packaging, are you referencing the graphic
 234:10 that stated how many tool -- wrench sizes or
 234:11 how many wrenches the Max Axess Locking Wrench
 234:12 could replace?
 234:13 A. What I'm referring to was that icon
 234:14 that we just referenced on the packaging that
 234:15 said one tool, 16 wrenches. So in this
 234:16 particular message to Stephanie, I was stating
 234:17 that there should be some mention of the fact
 234:18 that this works on X number of wrenches in the
 234:19 DRTV spot.
 234:20 Q. Why did you say you think that you
 234:21 need to add this to the script?
 234:22 A. Because I think it's a -- I mean,
 234:23 it is definitely a very large selling point to

234:24 the fact that you can buy one wrench for \$20
 234:25 and it does the work of 14 or 16 wrenches.
 235:1 It's a powerful message. So it's something
 235:2 that I felt should be gotten across on the DRTV
 235:3 spot.
 235:4 Q. Had you seen the -- I think you
 235:5 said you had seen the Bionic Wrench packaging
 235:6 previously?
 235:7 A. Yes. Because it was in the Sears
 235:8 stores, yes.
 235:9 Q. And did you think that its image
 235:10 that also talked about the number of wrenches
 235:11 it could replace also sent a powerful message?
 235:12 A. I think any tool that can speak to
 235:13 the fact that it works on or that it can cover
 235:14 many different sizes or different tools is a
 235:15 powerful message, yes. And I think that's used
 235:16 on many other tools as well.

64	236:1 -236:10	Lowe, Jill 2015-10-29	00:00:26	00:35:22	00:04:10	Lowe_J-102915-3of:	M3.79
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Link > P150.1

236:1 Q. I will introduce, as Exhibit 54, a
 236:2 two-page document beginning with the Bates
 236:3 number Apex 17700?

236:4 A. Yes, I see that.

Link > P150.1.1

236:5 Q. And in this first page, it's an
 236:6 e-mail from you to Aaron Wits and Stephanie
 236:7 Kaleta; is that right?

236:8 A. Yes, it is.

236:9 Q. And it's from September 18th, 2012?

236:10 A. Yes.

65	236:22 -238:14	Lowe, Jill 2015-10-29	00:01:50	00:35:48	00:03:44	Lowe_J-102915-3of:	M3.80
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Link > P150.1.2

236:22 Q. And then you go on to say, Changing
 236:23 a lawnmower blade might be a good shot for this
 236:24 tool. A standard adjustable is more prone to
 236:25 round that fastener because it gets worn from
 237:1 being under the mower. This product will
 237:2 better grab that fastener. We should also get
 237:3 a close-up shot of the locking wrench [sic]
 237:4 feature on this wrench; do you see that?

237:5 A. Yes.

237:6 Q. Where did you get the idea of using
 237:7 changing a lawnmower blade for this shot?

237:8 A. That would have been discussions
 237:9 that I had internally with my team; most
 237:10 likely, Eric Broadaway. And I'm guessing that
 237:11 this came out after we saw -- I don't remember

237:12 the date that that script came out. Was that
 237:13 prior to September 18th? The one that we just
 237:14 talked about, I believe it was.
 237:15 Q. I believe so.
 237:16 A. So it's kind of taking a look at
 237:17 that and saying, Do we feel that this script
 237:18 will urge somebody to get off their couch to
 237:19 come to the store to buy this product, and we
 237:20 think that we need to convey uses that a lot of
 237:21 people can relate to. So doing the lawn mower
 237:22 is one that we felt would be a very good image
 237:23 that people could relate to. And the other
 237:24 feature that I had on here is because the
 237:25 locking feature was not in the marketplace, I
 238:1 wanted to make sure that we really zoned in on
 238:2 that to make that call out for the DRTV shoot.
 238:3 Q. Was the lawn mower idea yours or
 238:4 someone else on your team?
 238:5 A. I can't -- it might have been me.
 238:6 It might have been something I discussed with
 238:7 Eric. I mean, I can't remember that. But it
 238:8 definitely probably came from somebody at Apex.
 238:9 Q. Were you -- are you personally
 238:10 familiar with the challenges of changing a
 238:11 lawnmower blade?
 238:12 A. Me, personally, no, which is why I
 238:13 said that it probably came from somebody else
 238:14 at Apex.

[Link > Hide](#)

66	238:24 -239:12	Lowe, Jill 2015-10-29	00:00:40	00:37:38	00:01:54	Lowe_J-102915-3of:	M3.81
		238:24 Prior to this, had you seen any					
		238:25 articles or write-ups of Loggerhead's Bionic					
		239:1 Wrench?					
		239:2 A. Okay. I may or may not have. I					
		239:3 think my exposure to the Loggerhead Bionic was					
		239:4 just what I was able to see in the store, and					
		239:5 that would have been the product, the					
		239:6 packaging, and that display that we talked					
		239:7 about before.					
		239:8 Q. Had you ever read anywhere Dan					
		239:9 Brown Sr.'s account that he invented the tool					
		239:10 by watching his son fail to change a lawnmower					
		239:11 blade with an improper tool?					
		239:12 A. I don't recall.					
67	272:15 -272:17	Lowe, Jill 2015-10-29	00:00:10	00:38:18	00:01:14	Lowe_J-102915-3of:	M3.85
	Link > P154.1	272:15 Q. I'm introducing, as Exhibit 61, a					

272:16 two-page document beginning with Bates number
 272:17 Apex 18113.

68	273:25 -274:5	Lowe, Jill 2015-10-29	00:00:18	00:38:28	00:01:04	Lowe_J-102915-3of:	M3.87
Link > P154.2.1		273:25 Q. Okay. And underneath the text here 274:1 where it's saying, Gathering competitive info 274:2 for the following items, two of the items 274:3 listed are Max Axess 8-inch and Max Axess 274:4 6-inch, correct? 274:5 A. That is correct.					

69	278:3 -278:16	Lowe, Jill 2015-10-29	00:00:41	00:38:46	00:00:46	Lowe_J-102915-3of:	M3.88
Link > P154.1.1		278:3 Q. This says, For Max Axess, the only 278:4 competitor I can identify was the Loggerhead 278:5 sold through Amazon. Do you believe that the 278:6 only competitor for the Max Axess locking 278:7 wrench is the Loggerhead Bionic Wrench? 278:8 A. The way that this is stated from 278:9 Brian is that was his opinion. That I could 278:10 identify, that was the only one sold through 278:11 Amazon. There -- I mean, if you look at the 278:12 marketplace and look at what products similarly 278:13 do, that -- I mean, I look at it and say, Yeah, 278:14 Loggerhead is one. And, at that point in time, 278:15 I don't know if there were others that were out 278:16 there as well.					
Link > Hide							

Play Time for this Script: **00:39:32**

Total time for all Scripts in this report: 00:39:32