

21 OF THIS DEPOSITION.

22 MR. FISHBACK: ALL RIGHT.

23 Q. WITH RESPECT TO THIS --

24 MR. CORCORAN: I'M SORRY. BEFORE SHE

25 ANSWERS --

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1 MR. PARKER: SHE'S NOT GOING TO ANSWER, STEVE.

2 MR. CORCORAN: -- I HAVE AN OBJECTION TO MAKE TO

3 THAT QUESTION.

4 VAGUE AND AMBIGUOUS, OVERBROAD, CALLS FOR
5 SPECULATION, AND ALSO ASSUMES FACTS.

6 MR. FISHBACK: ARE YOU INSTRUCTING HER NOT TO
7 ANSWER?

8 MR. PARKER: YEAH, SHE'S NOT GOING TO ANSWER
9 THAT QUESTION UNLESS IT HAS SOMETHING TO DO WITH VICTOR
10 GASKETS. WE'VE HAD THREE HEARINGS ON THIS TOPIC BEFORE
11 COMMISSIONER HEWITT.

12 MR. FISHBACK: ARE YOU INSTRUCTING HER NOT TO
13 ANSWER?

14 MR. PARKER: YES. NEXT QUESTION.

15 BY MR. FISHBACK:

16 Q. DO YOU RECALL DURING THAT TIME THAT THERE WAS,
17 IN ADDITION TO F.S. 1178, OTHER -- STRIKE THAT.

18 DO YOU RECALL OTHER POPULAR GASKET PARTS THAT
19 WERE BEING SUPPLIED TO GENERAL MOTORS IN A SUBSTANTIAL OR
20 SIGNIFICANT AMOUNT DURING THAT TIME PERIOD OF 1968 TO
21 1970?

22 MR. PARKER: OBJECTION; VAGUE AND AMBIGUOUS,
23 OVERBROAD, CALLS FOR SPECULATION. YOUR USE OF THE WORD
24 "SUBSTANTIAL" AND "POPULAR" ARE GOING TO BE --

25 MR. CORCORAN: STEVE CORCORAN. I'LL JOIN IN

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1 THE OBJECTIONS.

2 MR. PARKER: YEAH, I'M NOT GOING TO TELL YOU
3 HOW TO ASK THE QUESTION. NEXT QUESTION.

4 GO AHEAD, PLEASE.

5 BY MR. FISHBACK:

6 Q. DO YOU UNDERSTAND THE QUESTION?

7 A. YES.

8 Q. GO AHEAD. YOU CAN ANSWER.

9 MR. PARKER: TO THE EXTENT THAT YOU UNDERSTAND
10 IT.

11 THE WITNESS: THE FACILITY THAT I WORKED AT IN
12 1968, 1970 DID NOT SELL TO GENERAL MOTORS.

13 BY MR. FISHBACK:

14 Q. THE F.S. 1178 YOU SAID WAS A SMALL BLOCK CHEVY?

15 A. FOR AFTERMARKET SALES.

16 Q. OKAY. WHEN YOU SAY AFTERMARKET, WHAT DO YOU
17 MEAN BY THAT?

18 A. WE SOLD TO AUTOMOTIVE PARTS DISTRIBUTORS WHO
19 WOULD SELL TO, EVENTUALLY, AN END USER WHO WAS FIXING HIS
20 CAR IN THE BACKYARD.

21 Q. SO THE FACILITY THAT YOU WERE WORKING AT IN
22 CHURUBUSCO, INDIANA, THAT WAS THE DISTRIBUTION FACILITY
23 THAT'S GOING TO -- DESIGNED TO FACILITATE THE SUPPLY OF
24 PRODUCTS TO YOUR LOCAL AUTOMOTIVE SUPPLY STORE?

25 A. CORRECT.

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1 Q. IN THAT REGARD, WERE THERE GASKETS OR GASKET
2 KITS MANUFACTURED BY DANA CORPORATION OR SUPPLIED BY DANA
3 CORPORATION THAT YOU RECALL BEING POPULAR FOR USE ON
4 GENERAL MOTORS VEHICLES?

5 A. I --