

13 Q. AND HAVE YOU SEEN ANY RECORDS THAT CORRESPOND
14 TO TIMES EARLIER THAN THE 1940'S?
15 MR. PARKER: CONCERNING WHAT?
16 MR. FISHBACK: CONCERNING ANYTHING. I AM JUST
17 WONDERING IF THERE ARE ANY RECORDS AT ALL.
18 MR. PARKER: YOU MEAN CONCERNING VICTOR
19 GASKETS?
20 MR. FISHBACK: NO. I MEAN CONCERNING VICTOR
21 COMPANY, THE PRODUCTS THEY MANUFACTURED.
22 Q. I JUST WANT TO KNOW IF YOU HAVE EVER SEEN ANY
23 RECORDS WHATSOEVER THAT CORRESPONDED EARLIER THAN THE
24 1940'S?
25 A. YES.

0116

1 Q. GENERALLY, WHAT TYPE OF RECORDS ARE THOSE?
2 A. PAPERS IN SOME OF THE ENGINEERING FOLDERS.
3 Q. I WANT TO TALK ABOUT AFTERMARKET SALES
4 RECORDS, THE INFORMATION THAT IS NOT CONTAINED ON THE
5 MICROFICHE SALES RECORDS. OKAY?
6 A. YES.
7 Q. NOW, WITH RESPECT TO AFTERMARKET SALES RECORDS,
8 THEY BEGIN IN APPROXIMATELY WHAT TIME PERIOD AND NOT
9 STORED ON THE MICROFICHE?
10 A. IN THE VERY LATE 1960'S AFTER DANA ACQUIRED
11 VICTOR, THAT PARTICULAR PORTION OF THE MARKET WAS HANDLED
12 BY A DIFFERENT DIVISION OF DANA AND THE SALES RECORDS FOR
13 THAT DIVISION AND THOSE SALES WERE NOT PART OF THE VICTOR
14 PRODUCTS DIVISION RECORDS ANY LONGER.
15 Q. WHAT DIVISION IS THE AFTERMARKET SALES PART?
16 A. NOW?
17 Q. WHEN -- AFTER DANA CORPORATION ACQUIRED VICTOR
18 AND CHANGED THE RECORD KEEPING.
19 A. AT THE TIME, THAT PARTICULAR TIME, I BELIEVE,
20 THE NAME OF THE FIRST DIVISION WAS CALLED THE SERVICE
21 PARTS DIVISION.
22 Q. AND THAT'S IN THE LATE 1960'S?
23 A. YES.
24 Q. IT WAS CALLED SERVICE PARTS DIVISION?
25 A. YES. I BELIEVE SO.

0117

1 Q. HAVE YOU EVER SEEN SALES RECORDS FOR THE
2 SERVICE PARTS DIVISION?
3 A. YES. I WAS POSTING THEM AS AN INVENTORY
4 RECORDS CLERK WHEN I STARTED TO WORK IN 1968.
5 Q. OKAY. WHERE ARE -- DURING WHAT TIME WAS IT --
6 WAS THE AFTERMARKET SALES CONSIDERED PART OF THE SALES
7 PARTS DIVISION?
8 A. I DON'T KNOW. I CAN'T GIVE YOU YEARS.
9 Q. AT SOME POINT DID THE AFTERMARKET SALES COME
10 UNDER THE RUBRIC OR UMBRELLA OF A DIFFERENT DIVISION
11 OTHER THAN SERVICE PARTS?
12 A. THERE WAS A DIVISION CALLED THE PARTS CRAFT
13 DIVISION.
14 Q. WHAT WAS THE PARTS CRAFT DIVISION?
15 A. IT WAS A DIVISION THAT WAS STRICTLY DEDICATED
16 TO SELLING PARTS TO THE AFTERMARKET.
17 Q. DID IT EXIST AT THE SAME TIME THAT THE SERVICE
18 PARTS DIVISION EXISTED?
19 A. I DON'T KNOW.
20 Q. DO YOU HAVE ANY UNDERSTANDING AS TO THE
21 DIFFERENCE, IF ANY, BETWEEN THE SERVICE PARTS DIVISION
22 AND PARTS CRAFT DIVISION?
23 MR. PARKER: YOU MEAN AS TO WHAT THEY DID --