A. YES.
Q. WHEN DID YOU FIRST ATTEND DANA UNIVERSITY?
A. 1975.
Q. ARE THE ONLY STUDENTS WHO ATTEND DANA UNIVERSITY, EMPLOYEES OF DANA CORPORATION?
MR. PARKER: OBJECTION; CALLS FOR SPECULATION. TO THE EXTENT THAT YOU KNOW, TELL HIM.
THE WITNESS: SOME OF THE COURSES ARE OPENED UP TO OUTSIDE OF DANA PEOPLE, BUT I DON'T KNOW WHICH ONES, BUT I'VE NEVER ATTENDED ANY THAT HAD ANYONE OTHER THAN DANA EMPLOYEES.

BY MR. FISHBACK:
Q. THERE'S A GENERAL TYPE OF CLASS OR INSTRUCTION THAT YOU'VE RECEIVED OVER THE PAST -- OVER THE FIVE DAYS AND THE 12 OR SO TIMES THAT YOU'VE ATTENDED THAT YOU CAN CATEGORIZE THE SUBJECT MATTER PERHAPS?
A. CERTAINLY.
Q. WHAT IS IT?
A. THEY'RE ALL BUSINESS MANAGEMENT COURSES.
Q. DO YOU KNOW IF THERE ARE OTHER TYPES OF COURSES THAT ARE OFFERED AT DANA UNIVERSITY BESIDES BUSINESS MANAGEMENT?
A. NOT AT DANA UNIVERSITY.
Q. SO, FOR EXAMPLE, YOU KNOW THERE ARE NO COURSES CONCERNING INDUSTRIAL HYGIENE OR WORKPLACE SAFETY OFFERED?
A. THAT'S CORRECT.
Q. DO YOU KNOW HOW LONG DANA UNIVERSITY HAS BEEN IN OPERATION?
A. NOT EXACTLY.
Q. WHEN YOU ATTENDED IN 1975, WAS IT YOUR IMPRESSION THAT IT WAS A -- THIS WAS SOMETHING NEW THAT HAD RECENTLY STARTED?
MR. PARKER: COUNSEL, I'M GOING TO OBJECT AT THIS POINT. IT'S ONE THING TO GO INTO HER BACKGROUND A LITTLE BIT. NOW YOU'RE GOING INTO A TOPIC THAT WAS NOT

DISCLOSED THAT WAS ONE OF THE SUBJECTS THAT WE AGREED SHE WOULD BE AVAILABLE ON. UNLESS YOU CAN TELL ME THE RELEVANCY ON THIS OR IT'S ABOUT TO END, I'LL INSTRUCT HER NOT TO ANSWER.
MR. FISHBACK: IT'S CLEARLY FOUNDATIONAL.
MR. PARKER: NO. YOU'VE ASKED HER ABOUT EXPERIENCES. NOW YOU'RE GOING INTO DANA UNIVERSITY ITSELF. THIS IS A PERSON MOST KNOWLEDGEABLE DEPOSITION. BY COURT ORDER, WE'VE AGREED ON WHAT THE SUBJECTS WOULD BE. YOU'RE NOW GOING INTO A SUBJECT THAT IS NOT ONE OF THE CATEGORIES.
MR. FISHBACK: IF YOU WANT TO SUSPEND IT, GO AHEAD.
MR. PARKER: I'LL INSTRUCT HER NOT TO ANSWER.
MR. FISHBACK: THERE ARE NO GROUNDS TO INSTRUCT HER NOT TO ANSWER UNLESS THERE IS A PRIVILEGE, AND YOU KNOW IT.
MR. PARKER: I JUST TOLD YOU THIS IS A PERSON MOST KNOWLEDGEABLE DEPOSITION.
HAVE YOU MARKED AS EXHIBIT 1-B THE STIPULATION?
MR. FISHBACK: NO. I DON'T HAVE A STIPULATION. I HAVE YOUR PROPOSED STIPULATION.
MR. PARKER: THAT'S WHAT IT IS. IT'S A PROPOSED STIPULATION, AND WE'VE IDENTIFIED THAT THIS -- THE CATEGORIES THAT THIS DEPOSITION WILL COVER. YOU'RE