

3 Q. YES.
4 A. MAY I RESTATE THAT?
5 Q. SURE.
6 A. THOSE SALES RECORDS GO BACK TO VICTOR
7 MANUFACTURING GASKET COMPANY BEFORE DANA ACQUIRED THE
8 COMPANY, WHENEVER THE DEAL WAS MADE THERE.
9 Q. SO --
10 A. SO THOSE SALES RECORDS WOULD ENCOMPASS SALES TO
11 ALL CUSTOMERS, TO VICTOR MANUFACTURING GASKETS REGARDLESS
12 OF IF IT WAS O.E.M., SERVICE, AFTERMARKET, DISTRIBUTION,
13 WHATEVER.
14 Q. WHAT YEARS DID THE MICROFICHE SALES RECORDS
15 COVER?
16 MR. PARKER: ASKED AND ANSWERED.
17 BUT GO AHEAD.
18 THE WITNESS: THEY COVER UP TO ABOUT 1983.
19 BY MR. FISHBACK:
20 Q. AND DATING BACK HOW FAR?
21 A. WE'VE NEVER REALLY KNOWN THE VERY FIRST DATE.
22 BUT I CAN TELL YOU IT GOES BACK INTO THE EARLY 1940'S.
23 WE'VE SEEN SOME OF THOSE DATES.
24 Q. AND AT SOME -- AT SOME POINT, DOES THE
25 INFORMATION CONTAINED ON THE MICROFICHE SALES RECORDS
0097 CHANGE SO THAT IT ONLY REFLECTS SALES TO O.E.M.?
2 MR. PARKER: LACKS FOUNDATION, CALLS FOR
3 SPECULATION ON HER PART.
4 THE WITNESS: WHEN?
5 MR. PARKER: IF YOU KNOW.
6 THE WITNESS: THIS ISN'T JUST A YES OR NO. I'M
7 SORRY.
8 MR. PARKER: THAT'S OKAY. IT'S ONLY IF YOU
9 KNOW.
10 THE WITNESS: I DO KNOW.
11 MR. PARKER: OKAY.
12 MR. CORCORAN: JOIN IN THE FOREGOING
13 OBJECTIONS.
14 THE WITNESS: IN THE LATE 1960'S, WHEN DANA
15 ACQUIRED VICTOR, VICTOR PRODUCTS DIVISION SALES WERE TO
16 THE O.E.M. AND O.E. SERVICE. THE AFTERMARKET SALES
17 CUSTOMERS WERE HANDLED BY A DIFFERENT DIVISION. SO THOSE
18 SALES RECORDS WOULD NOT BE ON THE MICROFICHE FROM ABOUT
19 1967 TO THE TIME THAT THE MICRO -- THE SALES CARDS WERE
20 NO LONGER USED IN APPROXIMATELY 1983.
21 BY MR. FISHBACK:
22 Q. PRIOR TO DANA CORPORATION'S ACQUISITION OF
23 VICTOR, THEY MICROFICHED SALES RECORDS.
24 A. ALL THE SALES OF MANUFACTURING GASKETS TO ANY
25 OF THEIR CUSTOMERS, CORRECT.
0098 1 Q. YOU REFERENCED SOMETHING THAT I WANT TO BE --
2 I NEED TO CLARIFY; THAT IS, O.E.M., ORIGINAL EQUIPMENT
3 MANUFACTURER; CORRECT?
4 A. YES.
5 Q. AND YOU SAID O.E. SERVICE?
6 A. YES.
7 Q. WHAT DOES THAT MEAN?
8 A. MOST OF THE BIG ORIGINAL EQUIPMENT
9 MANUFACTURERS.
10 Q. WHO DO YOU INCLUDE IN THAT CATEGORY BY THE WAY?
11 MR. PARKER: ONE QUESTION AT A TIME. LET HER
12 FINISH THE FIRST QUESTION.
13 BY MR. FISHBACK: