I'VE SEEN HIM OR TALKED TO HIM.
Q. NO IDEA WHAT DIVISION OR UNIT HE WORKS FOR?
A. NO.
Q. OTHER THAN THE -- STRIKE THAT.
THE PARTS CRAFT DIVISION HANDLED THE AFTERMARKET ACCOUNT FOR NAPA AT LEAST UP UNTIL 1980, OR IT WOULD INCLUDE THE TIME PERIOD OF 1980?
MR. DUPLANTY: TODD DUPLANTY. OBJECTION; MISSTATES PRIOR TESTIMONY.
MR. PARKER: CAN WE HAVE THE QUESTION BACK, HEATHER.
(THE RECORD WAS READ BY THE REPORTER AS FOLLOWS:
"QUESTION: THE PARTS CRAFT DIVISION HANDLED THE AFTERMARKET ACCOUNT FOR NAPA AT LEAST UP UNTIL 1980, OR IT WOULD INCLUDE THE TIME PERIOD OF 1980?")
MR. PARKER: I'LL JOIN IN THE OBJECTION. BUT IT'S YOUR TESTIMONY.
THE WITNESS: YES.
BY MR. FISHBACK:

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Q. DO YOU KNOW IF THERE WAS ANOTHER DIVISION THAT WAS IN CHARGE OF HANDLING THE NAPA ACCOUNT IN THE TIME PERIOD 1959 TO 1980?
A. I DON'T KNOW.
Q. WHO WOULD HAVE THAT INFORMATION?
A. I WOULD PROBABLY GO TO CORPORATE RECEIVABLES.
Q. IS THAT IN TOLEDO?
A. YES.
Q. DO YOU KNOW WHO IS IN CHARGE OF THAT?
A. THE GAL THAT'S IN CHARGE OF IT NOW, THE DIVISION MANAGER IS LAUREN ANDERSON.
Q. MISS LAUREN ANDERSON OR MRS.?
A. MRS.
Q. WHY DO YOU THINK SHE WOULD HAVE THAT INFORMATION?
A. THAT GROUP CORPORATE RECEIVABLES HANDLED ALL THE INVOICE PAYMENTS FROM ALL OF HER CUSTOMERS, STILL DO, AND I WOULD -- THAT'S WHERE I GO FOR RECORDS TO FIND OUT WHAT DIVISION SOLD WHAT CUSTOMERS FOR HOWEVER LONG THEY KEPT RECORDS. THAT'S THE QUICKEST WAY I COULD THINK OF.
Q. DID THE PARTS CRAFT DIVISION USE THE SAME CATALOGS TO ASCERTAIN PARTS AS THE OTHER AFTERMARKET DIVISION UTILIZED?
MR. PARKER: CALLS FOR SPECULATION.
TO THE EXTENT YOU CAN ANSWER, GO AHEAD.

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MR. *DUPLANTY: TODD DUPLANTY. JOIN.*
THE WITNESS: THEY WOULDN'T HAVE USED THE SAME CATALOGS SPECIFICALLY. WELL, I CAN'T -- THAT I'M NOT SURE ACTUALLY.
BY MR. FISHBACK:
Q. DO YOU KNOW IF THERE WAS A SPECIFIC CATALOG THAT PERTAINED ONLY TO NAPA?
MR. DUPLANTY: TODD DUPLANTY. LACKS FOUNDATION, ASSUMES FACTS, CALLS FOR SPECULATION, VAGUE AND AMBIGUOUS.
MR. PARKER: HE'S JUST ASKING IF YOU KNOW.
THE WITNESS: YES.
BY MR. FISHBACK:
Q. YES, YOU KNOW THERE WERE SPECIFIC CATALOGS FOR USE ONLY IN THE NAPA ACCOUNT?
A. YES.