

7 DID NOT HAVE ANY PRIOR KNOWLEDGE ABOUT THE COMPANY.

8 Q. OKAY. WHEN YOU FIRST WERE EMPLOYED OR GOT A
9 JOB WITH DANA CORPORATION IN 1968, WHAT WAS YOUR JOB
10 TITLE?

11 A. I WAS INVENTORY RECORDS CLERK.

12 Q. WHAT DOES AN INVENTORY RECORDS CLERK DO?

13 A. OKAY. I WORKED AT A PACKAGE AND DISTRIBUTION
14 CENTER, AND MY JOB WAS TO INDICATE ON THE INVENTORY CARD
15 RECORDS INCOMING MATERIALS AND OUTGOING MATERIALS TO KEEP
16 A RUNNING INVENTORY OF WHAT WAS ON HAND.

17 Q. HOW LONG DID YOU WORK AS AN INVENTORY RECORDS
18 CLERK?

19 A. TWO YEARS.

20 Q. SO UNTIL 1970?

21 A. YES.

22 Q. DURING THAT TIME 1968 TO 1970, DID YOU BECOME
23 FAMILIAR WITH THE PRODUCTS THAT WERE BOTH INCOMING AND
24 OUTGOING?

25 A. NOT REALLY.

0029

1 Q. I THINK YOU REFERRED TO AS INCOMING AND
2 OUTGOING MATERIALS. WHAT DO YOU MEAN BY "MATERIALS"?

3 A. PARTS.

4 Q. WERE THEY RAW MATERIALS?

5 A. NO. THEY WERE LIKE MADE COMPONENTS.

6 Q. SO THE FINISHED PRODUCT?

7 A. YES.

8 Q. AND WHAT FINISHED PRODUCTS WERE THEY?

9 A. AUTOMOTIVE PARTS FOR ENGINES, CHASSIS. IT WAS
10 PRODUCTS THAT WERE MADE BY OTHER DIVISIONS OF DANA
11 CORPORATION.

12 Q. AT THE -- WHAT CITY DID YOU FIRST START WORKING
13 AT AS THE INVENTORY RECORDS CLERK?

14 A. CHURUBUSCO, INDIANA, AND THAT'S
15 C-H-U-R-U-B-U-S-C-O.

16 Q. AND SO THIS WAS A MANUFACTURING FACILITY?

17 A. NO.

18 Q. PURELY DISTRIBUTION?

19 A. PACKAGING AND DISTRIBUTION.

20 Q. SO I THINK I UNDERSTAND HOW THAT WORKS, BUT
21 BASICALLY THE FINISHED MATERIALS WOULD COME INTO
22 CHURUBUSCO, INDIANA, THE FACILITY THERE, AND THEY WOULD
23 BE PACKAGED THERE AND THEN SHIPPED OUT TO WHOEVER THE
24 PURCHASER WAS?

25 A. CORRECT.

0030

1 Q. AND YOU SAID THERE WERE AUTO PARTS FOR
2 ENGINES. DO YOU REMEMBER ANY SPECIFIC TYPES OF AUTO
3 PARTS FOR ENGINES THAT WERE --

4 A. GASKETS.

5 Q. OKAY. ANYTHING ELSE?

6 A. OIL SEALS.

7 Q. ANYTHING ELSE?

8 A. PISTON RINGS, HOSE, CAMSHAFTS, STUFF LIKE THAT.

9 Q. ANYTHING ELSE YOU CAN RECALL OTHER THAN THE
10 SPECIFIC ITEMS THAT YOU'VE MENTIONED?

11 A. VALVES, LIFTERS.

12 Q. WHAT'S A "LIFTER"?

13 A. WELL, I CAN TELL YOU WHAT IT LOOKS LIKE. BUT I
14 CAN'T TELL YOU WHAT IT DOES.

15 Q. THAT'S GOOD.

16 A. IT'S GOT LIKE A ROUND METAL, AND IT'S GOT A
17 STICK ON IT. THAT'S WHY WE CALL THEM LIFTERS.