

21 THE WITNESS: YEAH, I WOULD NEED YOU TO BE  
22 MORE SPECIFIC TO ME, PLEASE.  
23 BY MR. FISHBACK:

24 Q. OKAY. THE PROCESS BY WHICH THE CHURUBUSCO  
25 INDIANA FACILITY WAS PURCHASING FROM OTHER DANA

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1 MANUFACTURING FACILITIES, THAT WAS OCCURRING, YOU SAID,  
2 WHEN YOU GOT THERE IN THE LATE 1960'S?

3 A. YES.

4 Q. MY QUESTION IS AT ANY POINT IN TIME AFTER YOU  
5 GOT THERE, DID YOU -- WERE YOU TOLD OR DID YOU GET THE  
6 IMPRESSION THAT IT HAD BEEN DONE A WHOLE LOT DIFFERENT  
7 PRIOR TO YOUR EMPLOYMENT -- YOUR COMMENCEMENT OF  
8 EMPLOYMENT WITH DANA IN THE LATE '60S.

9 MR. PARKER: SAME OBJECTIONS. IT'S VAGUE AND  
10 AMBIGUOUS, OVERBROAD. IT'S AN UNINTELLIGIBLE QUESTION,  
11 THINGS WERE DONE A WHOLE LOT DIFFERENT. IT'S ALSO, BY  
12 THE WAY, OUTSIDE THE SCOPE OF WHAT SHE CAN TESTIFY AS  
13 REGARDING HER BEING THE PERSON MOST KNOWLEDGEABLE, AS  
14 NEAR AS I CAN TELL, AT LEAST AS PHRASED.

15 IS THERE ANY WAY TO ANSWER THAT QUESTION?

16 THE WITNESS: I RECALL NOTHING LIKE YOU  
17 DESCRIBE AT THE TIME THAT I WENT TO WORK THERE.

18 BY MR. FISHBACK:

19 Q. OKAY. WHO IS KNOWLEDGEABLE ABOUT THE  
20 CHURUBUSCO, INDIANA, FACILITY AND THE WAY IN WHICH IT  
21 OPERATED AND SUPPLIED TO AFTERMARKET CUSTOMERS IN THE  
22 TIME PERIOD PRIOR TO YOUR EMPLOYMENT WITH DANA?

23 MR. PARKER: ASSUMES FACTS NOT IN EVIDENCE,  
24 CALLS FOR SPECULATION.

25 BUT TO THE EXTENT THAT YOU THINK YOU MIGHT KNOW

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1 SOMETHING.

2 THE WITNESS: THE FACILITY WAS OPEN IN 1962. I  
3 DON'T KNOW HOW LONG DON MUELLER HAD WORKED THERE BY THE  
4 TIME I GOT THERE, BUT HE'S PROBABLY ONE OF THE OLDER  
5 ORIGINAL PEOPLE.

6 BY MR. FISHBACK:

7 Q. WHAT IS THE PRIVATE BRANDS DIVISION?

8 A. IT WAS THE NEWER NAME FOR THE NATIONAL ACCOUNTS  
9 DIVISION.

10 Q. DID THEY SERVE THE SAME FUNCTION?

11 A. YES.

12 Q. BY THE WAY, BEFORE I GO TO THE NEXT QUESTION,  
13 DO YOU KNOW ANY OF THE -- STRIKE THAT.

14 WHEN WAS THE PRIVATE BRANDS DIVISION STARTED?

15 A. I DON'T REMEMBER.

16 Q. IS IT STILL IN OPERATION TODAY?

17 A. NO.

18 Q. WHEN DID IT END?

19 A. 19 -- EARLY 1990'S, I BELIEVE.

20 Q. DO YOU KNOW ANY OF THE PERSONS WHO PREVIOUSLY  
21 WORKED IN THE PRIVATE BRANDS DIVISION?

22 A. WHAT'S HIS NAME? THERE'S ONLY ONE GUY I  
23 REMEMBER. HIS FIRST NAME IS JESSE. WHAT THE HECK IS HIS  
24 LAST NAME? I CAN SEE HIM. I CAN'T REMEMBER HIS LAST  
25 NAME.

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1 Q. DOES HE STILL WORK AT --

2 A. I BELIEVE HE'S STILL WORKING FOR DANA.

3 Q. DO YOU KNOW IN WHAT CAPACITY OR DIVISION?

4 A. NO. I CAN'T REMEMBER HIS LAST NAME. I THINK  
5 HE STILL WORKS FOR DANA. IT'S BEEN SEVERAL YEARS SINCE