

MR. PARKER: CAN YOU SPELL THAT FOR THE RECORD.
THE WITNESS: V-I-V-I-R-I-T-O.

BY MR. FISHBACK:

Q. AND WHAT'S HER POSITION NOW?

A. INTERNATIONAL SALES ADMINISTRATOR AND SALES
ANALYST FOR ME. SHE WORKS FOR ME.

Q. DO YOU KNOW WHAT SHE DID FOR MR. KOERNER?

A. I BELIEVE SHE WAS THE SALES SECRETARY AT THAT
TIME.

Q. IS THERE SOMEONE THAT YOU KNOW WHO'S BEEN IN
THE SALES DEPARTMENT LONGER THAN MISS VIVIRITO?

A. SALES OPERATIONS DEPARTMENT?

Q. YES.

A. MY DEPARTMENT, NO.

Q. IS THERE SOMEONE IN THE COMPANY IN DANA
ANYWHERE THAT HAS BEEN IN THE SALES OPERATION UNIT THAT'S
BEEN WITH THE COMPANY LONGER?

A. THAT'S BEEN IN THE VICTOR SALES OPERATIONS?

Q. YES. AND MY THINKING IS THAT MAYBE THEY WERE

AT THE SALES OPERATION AND WENT SOMEWHERE ELSE BUT HAVE
BEEN WITH THE COMPANY FOR HOWEVER LONG?

A. I UNDERSTAND.

I DON'T THINK SO.

Q. WHAT CITY DOES MISS VIVIRITO WORK IN?

A. IN LISLE.

Q. IN LISLE. DOES SHE LIVE IN THE AREA AS WELL?

A. YES.

Q. WHAT CITY DOES SHE LIVE IN?

A. WOODRIDGE.

Q. WOODRIDGE. SO IS THERE ESSENTIALLY NO WAY TO
ASCERTAIN THE DOLLAR AMOUNT OF TOTAL PURCHASES MADE BY A
PARTICULAR CUSTOMER FOR THE YEARS 1959 TO 1980?

MR. PARKER: I'M GOING TO OBJECT AS VAGUE AND
AMBIGUOUS AS PHRASED AND LACKS FOUNDATION.

TO THE EXTENT YOU CAN ANSWER THAT, GO AHEAD.

THE WITNESS: I DO NOT KNOW.

BY MR. FISHBACK:

Q. DO YOU KNOW WHAT THE DOCUMENT RETENTION POLICY
IS FOR ACCOUNTING DOCUMENTS?

A. NO.

Q. WHO'S IN CHARGE OF THE ACCOUNTING DEPARTMENT,
ACCOUNTS RECEIVABLE?

A. AT CORPORATE HEADQUARTERS THE DIRECTOR OF --
IT'S CORPORATE CREDIT, I'M SORRY, IS THE NAME OF THE

GROUP.

Q. OKAY.

A. THEIR DIRECTOR OR THE HEAD OF THAT GROUP, HER
NAME IS LAUREN ANDERSON.

Q. I THINK YOU'VE GIVEN ME HER NAME BEFORE, I
APOLOGIZE. WE'LL TURN BACK TO THE CUSTOMER ISSUE IN A
COUPLE OF MINUTES, BUT I NEED TO DIGRESS TO GET SOME MORE
INFORMATION ABOUT YOUR EXPERIENCE IN DANA.

AND YOU SAID THAT YOU WERE IN THE SEALING --
YOU WERE THE INVENTORY RECORDS CLERK IN CHURUBUSCO FROM
1968 TO 1970.

WHAT DID YOU DO AFTER THAT?

A. I WAS AT THE SERVICE PARTS OPERATIONS DIVISION
FOR THREE YEARS TOTAL. I HELD THE INVENTORY RECORDS
CLERK POSITION, STAGING AREA CLERK'S POSITION, AND SENIOR
INVENTORY RECORDS CLERK IN THAT FACILITY.

Q. LET ME BREAK IT DOWN. WHAT WAS THE NEXT