

21 Q. SURE. YOU SAID FROM THE 1940'S TO THE 1960'S,
22 ALL VICTOR CORPORATION'S SALES RECORDS WERE ON THE
23 MICROFICHE AND THAT WOULD INCLUDE O.E.M. AND AFTERMARKET;
24 CORRECT?

25 A. YES.

0106

1 MR. PARKER: MISSTATES HER TESTIMONY.
2 GO AHEAD.

3 BY MR. FISHBACK:

4 Q. BUT THEY'RE STILL LISTED BY PART NUMBER;
5 RIGHT?

6 A. YES. BY VICTOR PART NUMBER.

7 Q. VICTOR PART NUMBER?

8 A. YES.

9 Q. THERE'S A LEDGER OF VICTOR PART NUMBERS
10 SOMEWHERE?

11 MR. PARKER: BY "LEDGER," YOU MEAN A LIST OF
12 THEM?

13 BY MR. FISHBACK:

14 Q. BY LEDGER, I MEAN A KEY SO IF IT SAYS PART NO.
15 1, 2, 3, I COULD GO TO THE KEY AND SAY PART NO. 1,2,3, IS
16 A, YOU KNOW, ONE-EIGHTH INCH GASKET FOR USE ON --

17 A. NO.

18 Q. -- "X" PRODUCT?

19 A. NO.

20 Q. THERE'S NOTHING LIKE THAT?

21 A. NO.

22 Q. HOW WOULD YOU KNOW WHAT THE PART NUMBER WAS OR
23 WHAT IT CORRESPONDED TO? DO YOU KNOW WHAT IT MEANS?

24 A. I WOULD HAVE TO LOOK IT UP IN THE
25 ENGINEERING ROOM.

0107

1 Q. IT'S A PROCESS, THEN, IF YOU GET THE MICROFICHE
2 SALES RECORDS AND YOU LOOK AT THE PART NUMBER AND YOU
3 THEN HAVE TO TAKE THE PART NUMBER AND GO AND FIND THE
4 ENGINEERING CARD FOR THAT PARTICULAR PART NUMBER?

5 A. YES.

6 Q. AND THE ENGINEERING CARDS, THAT'S WHAT YOU
7 TALKED ABOUT EARLIER AS BEING STORED IN THE Lisle OR
8 ROBINSON PLANT?

9 A. YES.

10 Q. AND DID YOU SAY THOSE WENT BACK TO THE 1940'S
11 AS WELL?

12 A. I DON'T KNOW.

13 Q. YOU'RE NOT SURE. OKAY.

14 MR. PARKER: AGAIN, IT'S BEEN AN HOUR OR SO.
15 WHEN YOU GET TO A STOPPING POINT, LET'S TAKE A FEW
16 MINUTES' BREAK.

17 BY MR. FISHBACK:

18 Q. OKAY. FOR THE TIME PERIOD AFTER DANA
19 CORPORATION ACQUIRED VICTOR, THE MICROFICHE SALES RECORDS
20 DO NOT INCLUDE O.E.M.; IS THAT RIGHT?

21 A. NO. THEY DO INCLUDE O.E.M.

22 Q. OKAY. ARE THEY REFERENCED OR ORGANIZED IN
23 SOME DIFFERENT FASHION?

24 A. NO.

25 Q. OKAY. SO ON THE MICROFICHE SALES RECORDS FOR

0108

1 THE TIME PERIOD AFTER DANA CORPORATION ACQUIRED VICTOR,
2 THERE ARE BOTH O.E.M. AND AFTERMARKET SALES?

3 A. THERE'S ONLY O.E.M. SALES.

4 Q. THERE'S ONLY O.E.M. SALES?

5 A. THERE'S ONLY O.E.M. SALES.