

18 THE WITNESS: HE'S THE SALES MANAGER FOR OUR
19 VICTOR REINZE VALVE SEALS.
20 BY MR. FISHBACK:
21 Q. WHERE'S THAT FACILITY LOCATED?
22 A. AVILLA, INDIANA.
23 Q. DO YOU HAVE REGULAR CORRESPONDENCE WITH
24 MR. LEHMANN?
25 A. OH, YES.
0157
1 Q. THE SAME WITH MR. JOHNSON?
2 A. NO.
3 Q. DO YOU KNOW FOR HOW LONG MR. LEHMANN WORKED IN
4 THE PARTS CRAFT DIVISION?
5 A. NO.
6 Q. DO YOU KNOW HOW LONG MR. JOHNSON WORKED IN THE
7 PARTS CRAFT DIVISION?
8 A. NO.
9 Q. DO YOU KNOW WHAT THEIR SPECIFIC
10 RESPONSIBILITIES WERE IN TERMS OF WHEN THEY WORKED IN THE
11 PARTS CRAFT DIVISION?
12 A. NOT SPECIFIC.
13 Q. DO YOU KNOW IF THE SALES FORCE IN THE PARTS
14 CRAFT DIVISION WAS ORGANIZED BY CUSTOMER OR BY -- IN SOME
15 OTHER FASHION SUCH AS LOCATION?
16 A. THEY WERE REGIONAL SALES AND DISTRICT SALES.
17 THAT'S ALL I KNOW.
18 Q. DO YOU KNOW WHERE MR. JOHNSON'S REGION OR
19 DISTRICT WAS?
20 A. NO.
21 Q. DO YOU KNOW WHERE MR. LEHMANN'S REGION OR
22 DISTRICT WAS?
23 A. INDIANA OR OHIO AREA. INDIANA, I BELIEVE.
24 Q. DO YOU KNOW HOW MANY SALES PERSONS THERE WERE
25 PER REGION OR DISTRICT?
0158
1 A. NO.
2 Q. WHO WAS IN CHARGE OF THE PARTS CRAFT DIVISION?
3 A. I DON'T KNOW THAT I REMEMBER. I DON'T
4 REMEMBER.
5 Q. THERE'S LIKELY A RECORD THAT INDICATES WHO WAS
6 IN CHARGE OF THE PARTS CRAFT DIVISION DURING THE '59 AND
7 '80 TIME PERIOD, ISN'T THERE?
8 A. THERE'S HISTORY SOMEWHERE I WOULD THINK.
9 Q. DO YOU KNOW WHEN -- IS THERE STILL A PARTS
10 CRAFT DIVISION?
11 A. NO.
12 Q. WHEN DID IT CEASE TO BE OPERATIONAL?
13 MR. PARKER: ASKED AND ANSWERED. TO THE
14 EXTENT THAT YOU REMEMBER, GO AHEAD.
15 THE WITNESS: IT WAS IN THE 1990'S, SOME TIME.
16 BY MR. FISHBACK:
17 Q. DO YOU KNOW WHY IT CEASED TO OPERATE?
18 A. NO.
19 Q. OR EXIST?
20 A. NO.
21 Q. YOU WOULD MENTION THAT THERE WAS SOMETHING
22 CALLED A NATIONAL ACCOUNTS DIVISION?
23 A. YES.
24 Q. DO YOU KNOW WHEN THE NATIONAL ACCOUNTS DIVISION
25 WAS STARTED?
0159
1 A. ALL I REMEMBER IT WAS AFTER DANA ACQUIRED
2 VICTOR.