

Q. WHAT DID YOU DO AFTER THAT?

A. I BECAME THE WAREHOUSE MANAGER OF THE AFTERMARKET BRANCH IN DENVER, COLORADO.

Q. AS A CUSTOMER SERVICE MANAGER IN INDIANAPOLIS, DID YOU BECOME FAMILIAR WITH THE CUSTOMERS OF DANA?

A. I BECAME FAMILIAR WITH THE CUSTOMERS THAT BOUGHT PRODUCT FROM THE MIDWEST PARTS DEPOT.

Q. WAS IT A REGIONAL -- STRIKE THAT.

WERE THERE CERTAIN CUSTOMERS WHO DEALT EXCLUSIVELY WITH THE INDIANAPOLIS PARTS DEPOT?

A. IT WAS PARTS STORES IN THE INDIANAPOLIS AREA, PRETTY MUCH IN THAT REGION; AND AS A LARGE DISTRIBUTION CENTER, THERE WERE SEVERAL OF THE BRANCHES THAT THEY WERE RESPONSIBLE FOR MAINTAINING THE INVENTORY IN THE REGIONAL BRANCHES.

Q. WHAT WERE YOUR BASIC JOB DUTIES AS A WAREHOUSE MANAGER IN DENVER?

A. I WAS RESPONSIBLE FOR MAINTAINING, ACQUIRING MORE INVENTORY; KEEPING ANY INVENTORY YOU HAVE IN THE WAREHOUSE TO SUPPLY THE CUSTOMERS IN THAT REGION WITH THE

AUTOMOTIVE AFTERMARKET PRODUCTS AND PACKAGED AND SHIPPED AND PREPARED WILL CALL AND TOOK ORDERS.

Q. AT THE DENVER WAREHOUSE, WAS IT BOTH DISTRIBUTION AND PACKAGING?

A. NO.

Q. THE GOODS CAME PACKAGED TO YOU?

A. YES.

Q. AND THEN IT WAS SHIPPED OUT FROM DENVER TO THE VARIOUS REGIONAL OFFICES AND LOCAL CUSTOMERS?

A. MOST OF IT WAS PICKED UP AT THE WAREHOUSE BY LOCAL CUSTOMERS, AND THEN THERE WAS SOME SHIPPING DONE TO CUSTOMERS IN THE AREA.

Q. WAS IT THE DENVER WAREHOUSE'S RESPONSIBILITY TO MAINTAIN THE INVENTORY IN ANY OTHER REGIONAL DISTRIBUTION FACILITIES?

A. NO.

Q. HOW LONG WERE YOU THE WAREHOUSE MANAGER?

A. ONE YEAR.

Q. AND THEN WHAT DID YOU DO?

A. I WENT TO WORK FOR THE VICTOR PRODUCTS DIVISION IN LISLE AS A SALES OPERATIONS MANAGER, THE JOB I CURRENTLY HOLD.

Q. AND THAT WAS IN 1987?

A. '88.

Q. '88. WILL YOU GIVE ME A SUMMARY OF WHAT YOUR

JOB RESPONSIBILITIES ARE CURRENTLY. I SHOULD SAY, WHAT YOUR JOB RESPONSIBILITIES HAVE BEEN SINCE 1988.

A. CERTAINLY. I'M RESPONSIBLE FOR MANAGING A DEPARTMENT OF PEOPLE WHO RECEIVE CUSTOMER ORDERS FOR THE GASKETS. WE INPUT THOSE ORDERS INTO EACH OF OUR PLANTS' COMPUTER DATABASE. WE'RE RESPONSIBLE FOR THE PRICING SUPPORT FUNCTIONS FOR ALL THE SALES ACCOUNT MANAGERS. WE ARE THE COORDINATORS FOR ALL CUSTOMS COMPLIANCE AND N.A.F.T.A. PROGRAM THROUGHOUT THE DIVISION. I DO TRAINING ON OUR M.R.P. SYSTEM THROUGHOUT THE DIVISION.

Q. WHAT'S AN "M.R.P. SYSTEM"?

A. MANAGEMENT RESOURCE PLANNING. IT'S THE SYSTEM THAT OUR PLANTS USE TO GET THE ORDERS AND SCHEDULING AND PRODUCTION, AND IT'S JUST THE COMPUTER SYSTEM. I HAVE ABOUT FIVE MILLION IN DIRECT CUSTOMER ACCOUNTS THAT I'M RESPONSIBLE FOR.