

12 Q. WHAT ELSE?
13 A. VALVE COVER GASKETS. THAT'S NOT REALLY ON THE
14 ENGINE BUT ON THE BLOCK.
15 Q. YOU CAN SAY IN THE FRONT END OF AN AUTOMOBILE.
16 A. WATER PUMP GASKETS, TRANSMISSION GASKETS,
17 EXHAUST INTAKE MANIFOLD, E.G.R. GASKETS.
18 Q. WHAT'S AN "E.G.R. GASKET"?
19 A. IT'S FOR THE -- THERE'S AN E.G.R. VALVE
20 ASSEMBLY THAT'S USED IN MOST VEHICLES AND THOSE HAVE GOT
21 EACH -- WHAT THEY CALL E.G.R. GASKETS THAT PROTECT THE
22 OPENINGS OR THE CONNECTOR POINTS BECAUSE USUALLY THAT'S
23 WHAT A GASKET IS FOR. IT'S TO -- OR WHERE TWO PIECES OF
24 METAL MARRY UP TOGETHER TO GET AN EXTRA SEALING SO THAT
25 OIL OR WATER DON'T GET IN OR OUT OR AIR OR STUFF LIKE
0070
1 THAT.
2 Q. ANY OTHER KINDS OF GASKETS?
3 A. NOT THAT I CAN THINK OF RIGHT OFFHAND, NO.
4 Q. ARE YOU THE BEST PERSON TO ASK ABOUT THE TYPES
5 OF GASKETS? IS THERE ANOTHER PERSON THAT YOU WOULD DEFER
6 TO?
7 A. YES. THERE IS OTHER PEOPLE BY FAR.
8 Q. WHO WOULD THE OTHER --
9 A. RICH KOZINSKI WOULD BE AN EXCELLENT ONE.
10 Q. ANYONE ELSE WHO WOULD HAVE KNOWLEDGE ABOUT THE
11 SPECIFIC TYPES OF GASKETS THAT DANA MANUFACTURED OR
12 VICTOR MANUFACTURED AND SUPPLIED?
13 A. OUR SALES ACCOUNT MANAGERS SELL SPECIFIC
14 GASKETS TO THEIR CUSTOMERS. SO THERE WOULD BE A LOT OF
15 OTHER PEOPLE BESIDES MYSELF THAT WOULD BE MORE FAMILIAR
16 WITH THE APPLICATIONS.
17 Q. IS THERE SOMEONE IN THE SALES DEPARTMENT THAT'S
18 BEEN AN EMPLOYEE OF DANA AND/OR VICTOR THROUGH THE
19 1970'S?
20 MR. PARKER: YOU MEAN IS HE STILL THERE?
21 BY MR. FISHBACK:
22 Q. IS HE STILL THERE?
23 A. IN SALES, NOT THAT I CAN RECALL, NO.
24 Q. BY THE WAY, DO YOU HAVE INFORMATION ABOUT DANA
25 CORPORATION OR VICTOR CORPORATION'S MANUFACTURE AND
0071
1 SUPPLY OF GASKETS PRIOR TO YOUR EMPLOYMENT THERE IN 1968?
2 FOR EXAMPLE, DOES YOUR KNOWLEDGE GO BACK INTO THE 1950'S?
3 MR. PARKER: I'M GOING TO OBJECT AS VAGUE AND
4 AMBIGUOUS. WHEN YOU SAY, "DOES YOUR KNOWLEDGE GO BACK,"
5 ARE YOU ASKING HER WHAT SHE MAY HAVE DONE? WHAT EXACTLY
6 ARE YOU ASKING?
7 MR. FISHBACK: I JUST WANT TO KNOW IF SHE HAS
8 ANY INFORMATION ABOUT DANA CORPORATION, PRIOR TO 1968,
9 THE MANUFACTURE OF THEIR MATERIALS AND PRODUCTS THEY
10 SUPPLIED.
11 THE WITNESS: ONLY WHAT I'VE PICKED UP AND
12 LEARNED IN THE NORMAL COURSE OF BUSINESS.
13 BY MR. FISHBACK:
14 Q. HAVE YOU MADE IT A POINT TO EDUCATE YOURSELF
15 ABOUT DANA'S MANUFACTURING PROCESSES PRIOR TO YOUR
16 EMPLOYMENT WITH DANA IN 1968?
17 A. NO.
18 Q. HAVE YOU MADE IT A POINT TO EDUCATE YOURSELF
19 ABOUT THE TYPES OF PRODUCTS THAT DANA WAS MANUFACTURING
20 PRIOR TO 1968 IN YOUR EMPLOYMENT WITH DANA?
21 A. NO.
22 Q. HAVE YOU MADE IT A POINT TO BECOME FAMILIAR