POSITION THAT YOU HELD AFTER THE INVENTORY RECORDS CLERK?
A. IT WOULD BE THE STAGING AREA CLERK.
Q. AND THIS STILL IS AT CHURUBUSCO?
A. YES.
Q. HOW LONG DID YOU HOLD THAT POSITION?
A. PROBABLY LESS THAN A YEAR. SIX MONTHS MAYBE.
Q. WHAT KIND OF JOB RESPONSIBILITIES DID YOU HAVE?
A. I WAS RESPONSIBLE FOR DIRECTING THE COLLECTION

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OF PRODUCTS TO GO ON THE TRUCKS DOWN TO OUR HAGERSTOWN DISTRIBUTION CENTER EVERY DAY.
Q. OKAY. SO THE PRODUCTS WERE AT THE CHURUBUSCO FACILITY. YOU DIRECTED WHAT TRUCK TO PUT ON AND YOU LOAD --
A. I HAD PICKERS AND PACKERS, AND I WOULD GET THE LIST OF WHAT HAD TO GO DOWN THAT DAY, AND I WOULD PICK THE RECORDS AND GO DOWN TO THE STAGING AREA AND LOAD IT ON THE TRUCKS.
Q. DURING THAT TIME, DID YOU NOTICE A PARTICULAR PRODUCT THAT YOU KNEW TO BE SHIPPED MORE OFTEN THAN OTHERS?
A. NO.
Q. WHAT DID YOU DO AFTER YOU WERE A STAGING AREA CLERK?
A. I WENT BACK TO THE DEPARTMENT I STARTED IN AND WAS THE SENIOR INVENTORY RECORDS CLERK.
Q. HOW LONG DID DO YOU THAT?
A. PROBABLY SIX TO EIGHT MONTHS.
Q. WHAT WAS YOUR JOB RESPONSIBILITIES?
A. I WAS RESPONSIBLE FOR GIVING THE INVENTORY RECORDS CLERK THEIR JOB, WORKLOAD FOR THAT DAY.
Q. WHO GAVE THE INFORMATION TO YOU?
A. I THINK I GOT IT FROM THE PEOPLE WHO WERE PRINTING OFF THE REPORTS.

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Q. SO THE COMPUTER PRINTOUT?
A. YEAH.
Q. THEY'D GIVE YOU A BIG STACK AND SAY, "HERE YOU GO"?
A. AND I SEPARATE THEM DOWN TO THE DIFFERENT -- FOR THE DIFFERENT PEOPLE ON -- I THINK WE HAD LIKE THREE OR FOUR OF THE WHEELS, AND THREE OR FOUR PEOPLE. SO I WOULD SEPARATE THE WORK DOWN, AND DISTRIBUTE IT TO THE PEOPLE.
Q. DID YOU DURING THAT TIME BECAME FAMILIAR WITH THE CUSTOMERS OF VICTOR DANA?
A. NO.
Q. THIS IS -- AGAIN, YOU'RE STILL WORKING WITH JUST RANDOM PART NUMBERS AND CUSTOMER NUMBERS OF SOME SORT?
A. NO.
Q. JUST THE PART NUMBERS?
A. JUST THE DANA VICTOR NUMBER.
Q. OKAY.
A. OR THE DANA NUMBER, YOU KNOW, WHATEVER PRODUCTS.
Q. OKAY. WHAT DID YOU DO AFTER YOUR WORK AS A SENIOR INVENTORY RECORDS CLERK?
MR. PARKER: YOU'RE TALKING ABOUT BASICALLY WITHIN DANA? THE WAY YOU PHRASE IT SOMETIMES IT MIGHT BE

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OVERBROAD. SO I'LL ASSUME THESE QUESTIONS ARE DURING HER CAREER.