

OPINION, WAS A LARGER CUSTOMER OF AFTERMARKET -- SINGLE
LARGER CUSTOMER OF AFTERMARKET SINGLE GASKET PRODUCTS
OTHER THAN NAPA?

A. NO.

Q. DO YOU KNOW WHO, IF THERE WAS ANY -- IF THERE
WAS A PARTICULAR CONTACT PERSON AT NAPA THAT DEALT
EXCLUSIVELY WITH THE VARIOUS SALES PERSONNEL AT VICTOR
DANA?

A. I --

MR. GRAHAM: OBJECTION; ASSUMES FACTS.

I'M SORRY. I DIDN'T MEAN TO INTERRUPT. THIS
IS MICHAEL GRAHAM.

MR. PARKER: ACTUALLY, YOU DO MEAN TO INTERRUPT
THE WITNESS, AND THE WITNESS UNDERSTANDS THAT YOU MAY
HAVE OBJECTIONS AND SHE'LL TRY TO WAIT FOR THOSE TO BE
MADE BEFORE ANSWERING. I'LL JOIN IN THOSE OBJECTIONS.

GO AHEAD.

THE WITNESS: I DON'T KNOW.

BY MR. FISHBACK:

Q. THERE ARE OTHER AFTERMARKET PARTS STORES WHO
HAVE BEEN LARGE CUSTOMERS OF DANA OTHER THAN NAPA;
CORRECT?

MR. PARKER: I'LL OBJECT AS TO THE WAY THAT YOU
CHARACTERIZED NAPA THERE A MOMENT AGO, AND IT LACKS
FOUNDATION BECAUSE SHE DOESN'T NECESSARILY JOIN IN THAT
SAME CHARACTERIZATION.

MR. GRAHAM: THIS IS MICHAEL GRAHAM. I'LL
JOIN, AND ALSO THAT THAT ASSUMES FACTS.

MR. PARKER: WHAT'S THE QUESTION AGAIN?

BY MR. FISHBACK:

Q. DO YOU HAVE THE QUESTION IN MIND?

MR. PARKER: IT LOOKS LIKE YOU'RE READING IT
OFF OF SOMETHING.

THE WITNESS: NO, NOT CLEARLY.

BY MR. FISHBACK:

Q. THERE ARE OTHER AFTERMARKET PART STORES WHO
HAVE BEEN CUSTOMERS OF THE DANA CORPORATION, VICTOR DANA
FOR AUTOMOTIVE GASKETS, OTHER THAN NAPA; CORRECT?

MR. PARKER: SAME OBJECTIONS.

HE'S JUST RE-READING IT. GO AHEAD.

THE WITNESS: YES.

BY MR. FISHBACK:

Q. WHO ARE THOSE? WHAT ARE THOSE?

A. THE ONES THAT COME TO MIND WOULD BE LIKE PARTS,
INC., OR PARTS PLUS I THINK THEY'RE ALSO CALLED. CAR
QUEST.

MR. PARKER: AND, AGAIN, WE'RE TALKING 1959 TO

1980?

THE WITNESS: OH. I DON'T KNOW.

BY MR. FISHBACK:

Q. SO YOU DON'T KNOW WHO THE OTHER SUPPLIERS OR,
RATHER, YOU DON'T KNOW WHO THE OTHER LARGE CUSTOMERS OF
DANA CORPORATION FOR AFTERMARKET AUTOMOTIVE GASKETS ARE
DURING THE TIME PERIOD OF '59 TO '80 BESIDES NAPA?

A. NO.

MR. PARKER: MISCHARACTERIZES HER TESTIMONY
UNLESS SHE TESTIFIES IT'S NAPA.

BUT WHY DON'T WE CLARIFY IT FOR HIM SO YOU
DON'T WASTE TOO MUCH TIME ON THIS.

THE WITNESS: OKAY. FROM THE TIME I CAME TO
WORK IN 1968 UNTIL 1980, THE END OF THE TIME PERIOD HERE,