

12 A. YES. MARCELLA, M-A-R-C-E-L-L-A, DUNCAN,
13 D-U-N-C-A-N.
14 Q. MISS DUNCAN, WHAT'S YOUR ADDRESS?
15 A. 13710, SOUTH DENDALL, WITH TWO L'S, DRIVE, IN
16 PLAINFIELD, ALL ONE WORD, P-L-A-I-N-F-E-I-L-D, ILLINOIS,
17 60544.
18 Q. IS THAT YOUR BUSINESS OR HOME ADDRESS?
19 A. HOME ADDRESS.
20 Q. OKAY. ARE YOU CURRENTLY EMPLOYED?
21 A. YES, I AM.
22 Q. WHO IS YOUR EMPLOYER?
23 A. DANA CORPORATION, THE SEALING PRODUCTS
24 DIVISION.
25 Q. WHAT'S THE ADDRESS OF YOUR WORK ADDRESS?
0007
1 A. 1945 OHIO STREET IN LISLE, SPELLED, L-I-S-L-E,
2 ILLINOIS, 60532.
3 Q. AND YOU SAY YOU WORKED FOR THE SEALING PRODUCTS
4 DIVISION OF DANA CORPORATION?
5 A. THAT'S CORRECT.
6 Q. HOW LONG HAVE YOU BEEN SO EMPLOYED?
7 A. I'VE WORKED FOR DANA SINCE 1968.
8 Q. DID YOU WORK FOR A DIFFERENT DIVISION AT THAT
9 TIME?
10 A. YES, I DID.
11 Q. WE'LL GET INTO THAT IN JUST A MINUTE, ACTUALLY.
12 A. OKAY.
13 Q. YOU'VE BEEN DEPOSED SEVERAL TIMES?
14 A. YES, SIR.
15 Q. DO YOU REMEMBER HOW MANY TIMES YOU'VE BEEN
16 DEPOSED?
17 A. NOT EXACTLY.
18 Q. CAN YOU GIVE ME JUST AN ESTIMATE?
19 A. 10 MAYBE; 10 OR 12.
20 Q. WHEN IS THE LAST TIME YOU WERE DEPOSED THAT YOU
21 CAN RECALL? RECENTLY, WITHIN THE PAST COUPLE OF MONTHS,
22 PERHAPS?
23 A. PROBABLY FOUR MONTHS. YEAH, FOUR MONTHS AGO.
24 Q. DO YOU KEEP A LIST OR A NOTATION SOMEWHERE OF
25 ALL THE CASES IN WHICH YOU'RE DEPOSED IN?
0008
1 A. YES. I KEEP A LIST OF THE DEPOSITION DATES.
2 Q. DO YOU HAVE --
3 A. IN MY OFFICE.
4 Q. OKAY. DO YOU ALSO KEEP COPIES OF THE
5 TRANSCRIPTS OF THE DEPOSITIONS?
6 A. NO.
7 Q. HAVE YOU EVER REVIEWED ANY PRIOR TRANSCRIPTS
8 FROM DEPOSITIONS THAT YOU HAVE BEEN GIVEN?
9 A. YES.
10 Q. WHEN WAS THE LAST TIME YOU REVIEWED A
11 TRANSCRIPT OF A PRIOR DEPOSITION?
12 A. PROBABLY A YEAR AGO.
13 Q. WAS THAT IN PREPARATION FOR SOMETHING SPECIFIC,
14 OR WAS IT JUST GENERAL -- I DON'T KNOW -- MAYBE A GENERAL
15 INTEREST?
16 A. NO. A LOT OF TIMES I WILL GET A COPY OF THE
17 TRANSCRIPT TO REVIEW IT FOR ACCURACY AND THAT WOULD HAVE
18 BEEN ONE OF THOSE.
19 Q. SINCE YOU'RE FAMILIAR, YOU'VE BEEN DEPOSED
20 BEFORE, I WON'T SPEND A LOT OF TIME REMINDING YOU OF THE
21 WAY IN WHICH DEPOSITIONS OPERATE OTHER THAN TO SAY WE'RE
22 OBVIOUSLY IN AN INFORMAL SETTING. BUT YOU'RE STILL UNDER