

22 Q. HOW WOULD YOU RESEARCH IT?
23 A. GOING BACK AND LOOKING AT MY SALES RECORDS.
24 Q. WHERE ARE THE SALES RECORDS KEPT?
25 A. IN LISLE.
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1 Q. ARE THEY KEPT -- COPIES OF THOSE SALES RECORDS
2 ALSO KEPT IN THE REPOSITORY?
3 A. I DON'T KNOW ABOUT THOSE SPECIFIC SALES RECORDS
4 BEING IN THE REPOSITORY.
5 Q. WHERE ARE THEY KEPT IN LISLE?
6 A. IN OUR OFFICE, THE SALES OFFICE.
7 Q. ARE THEY IN A COMPUTER FILE?
8 A. NO.
9 Q. PAPER FILES?
10 A. YES.
11 Q. JUST IN A ROOM OR STORAGE CABINETS?
12 A. IN OUR BOOKCASES.
13 Q. OKAY. ARE THEY ORGANIZED IN SOME FASHION?
14 A. BY YEAR.
15 Q. WITHIN -- AND HOW FAR BACK DO THE SALES RECORDS
16 GO?
17 A. THESE ARE FORECAST -- ANNUAL FORECAST AND
18 HISTORY SALES.
19 Q. OKAY.
20 A. 1990'S SOMETIME.
21 Q. WHERE ARE THE OTHER -- ARE THERE SALES RECORDS
22 THAT PERTAIN TO DATES AND TIMES THAT WOULD CORRESPOND TO
23 THE 1960'S, 1970'S AND 1980'S, THE SAME KINDS OF
24 DOCUMENTS THAT YOU SAY ARE KEPT IN LISLE NOW, FOR THE
25 1990'S?

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1 A. PROBABLY NOT.
2 Q. WHY DO YOU SAY THAT?
3 A. I'M TALKING ABOUT SALES FORECAST RECORDS THAT
4 WERE PREPARED ANNUALLY. I HAVEN'T SEEN ANYWHERE EARLIER
5 THAN LIKE THE 1990'S.
6 Q. IF YOU WANTED TO FIND OUT WHETHER THERE WERE
7 ANY OF THESE SUCH RECORDS PERTAINING TO DATES PRIOR TO
8 THE 1990'S, IS THERE ANY INDIVIDUAL THAT YOU WOULD ASK?
9 A. NO. I WOULD LOOK AROUND IN MY DEPARTMENT AND
10 MY ARCHIVES.
11 Q. IS THERE ANYONE WITHIN YOUR DEPARTMENT WHO
12 WOULD HAVE MORE INFORMATION ON THAT THAN YOURSELF?
13 A. NO.
14 Q. AND THE ARCHIVES THAT YOU JUST REFERENCED, IS
15 THAT THE BOOKCASES, THE SAME THING; OR IS THERE ANOTHER
16 ARCHIVES FACILITY?
17 A. NO. IT WOULD BE IN OUR OFFICES, IN OUR
18 OFFICES. THOSE ARE NOT WHAT WE CONSIDER CONTROLLED
19 DOCUMENTS THAT WOULD FALL UNDER OUR DANA DOCUMENT
20 RETENTION.
21 Q. OKAY. ARE THOSE -- ARE THESE DOCUMENTS DONE
22 RETROSPECTIVELY AT THE END OF THE YEAR OR AT THE
23 BEGINNING OF THE YEAR LOOKING TOWARD THE NEXT YEAR?
24 MR. PARKER: CALLS FOR SPECULATION.
25 IF YOU KNOW BACK THAT FAR.

0091
1 THE WITNESS: WE DO FORECASTING AND TRENDING
2 TWICE A YEAR.
3 BY MR. FISHBACK:
4 Q. WHEN'S THAT?
5 A. MIDDLE OF THE YEAR, LIKE IN JUNE, AND THEN FOR
6 THE END OF THE YEAR, USUALLY WOULD DO IT LIKE AROUND