

17 KNOW MORE ABOUT IT THAN ME.
18 BY MR. FISHBACK:
19 Q. THERE ARE --
20 A. REGARDLESS OF HOW MUCH KNOWLEDGE I HAVE.
21 Q. THERE ARE FOLKS --
22 A. I GUESS.
23 Q. -- WHO ARE SPECIFICALLY ENGAGED IN EITHER THE
24 PROCUREMENT OF OR SALES OF GASKETS THAT HAVE BEEN
25 MANUFACTURED BY OTHER ENTITIES; CORRECT?
0300
1 A. YES.
2 Q. HAVE YOU EVER HAD THAT POSITION?
3 A. YES, I DID SOME PURCHASING.
4 Q. WHEN WAS THAT?
5 A. JEEZ, THAT WAS DOWN IN THE MIDWEST PARTS DEPOT.
6 Q. AND THAT'S WHEN YOU WERE PROCURING FROM OTHER
7 GASKET MANUFACTURERS?
8 A. YES. WE DID GET SOME FROM OTHER PEOPLE, YES.
9 Q. ALL RIGHT. AND THAT WAS -- YOU WERE DOING THAT
10 IN THE MID 1980'S; RIGHT?
11 A. YES.
12 Q. FOR THE TIME PERIOD 1959 TO 1980, DO YOU HAVE
13 ANY INFORMATION ABOUT THE COMPANIES FROM WHOM VICTOR DANA
14 WAS ACQUIRING GASKETS AND THEN FOR USE IN -- WELL, IN RE
15 SELLING THEM TO A THIRD PARTY AND/OR VICTOR DANA SELLING
16 ITS GASKETS TO OTHER MANUFACTURERS FOR THEIR USE TO THIRD
17 PARTIES?
18 A. YES.
19 Q. FROM THE YEARS '59 TO '80?
20 A. YES.
21 Q. THEN I'LL REPHRASE THE QUESTION.
22 AND I'LL HAVE TO TALK TO THIS WITNESS THEN,
23 APPARENTLY, ABOUT CATEGORY NOS. 26 AND 27 AND AS WELL AS
24 CATEGORY NO. 9 AND AS WELL AS A NUMBER OF DOCUMENTS.
25 AND, FRANKLY, I HAVEN'T EVEN HAD AN OPPORTUNITY TO REVIEW
0301
1 THE REST OF MY NOTES AND SUCH TO SEE IF THERE IS OTHER
2 AREAS THAT I NEED TO FOLLOW UP ON. SO --
3 MR. PARKER: I UNDERSTAND THAT YOU WANT TO
4 RECESS. IT'S NOW 20 TO 6:00 LOCAL TIME. WE'VE GIVEN YOU
5 WELL OVER EIGHT HOURS. THESE ARE NARROW CATEGORIES ON
6 WHEN AND HOW THIS DEPOSITION WILL PROCEED. BUT I THINK
7 YOU'VE HAD ADEQUATE TIME IN THIS DEPOSITION.
8 LET ME STATE, YOU'RE PREPARED TO GO FORWARD?
9 THE WITNESS: YES.
10 MR. PARKER: COUNSEL, IT'S YOUR CHOICE.
11 MR. GRAHAM: THIS IS MICHAEL GRAHAM. I ALSO
12 HAVE A FEW MINUTES OF FOLLOW-UP QUESTIONS. I DON'T KNOW
13 IF WE CAN JUST DO THAT NOW.
14 MR. PARKER: SURE. YEAH.
15 MR. SABNI: THIS IS ROHIT SABNIS. I'M IN THE
16 SAME BOAT. I JUST HAVE A COUPLE OF QUESTIONS.
17 MR. PARKER: SURE. WHO WANTS TO GO FIRST?
18 MR. GRAHAM: I CAN GO FIRST. THIS IS MICHAEL.
19 MR. FISHBACK: AS THE INDIVIDUAL WHO HAS
20 NOTICED THIS DEPOSITION, I HAVE THE ABILITY TO RECESS THE
21 DEPOSITION, AND I'VE DONE SO.
22 SO WHILE I APPRECIATE YOU FOLKS ON THE PHONE
23 MIGHT HAVE SOME QUESTIONS, YOU'LL HAVE TO ASK THEM ON
24 ANOTHER OCCASION OF THIS WITNESS. BECAUSE, FOR TODAY,
25 THIS DEPOSITION IS FINISHED AND RECESSED AS OF WHATEVER
0302

1 TIME IT IS NOW FOR THE REASONS THAT I'VE ALREADY STATED,