

MR. PARKER: NO. BECAUSE SHE UNDERSTANDS THERE IS A DIFFERENCE. IF YOU WANT TO DEFINE TERMS, THAT'S A BETTER IDEA. WHY DON'T YOU DO IT IN A WAY SHE CAN UNDERSTAND?

THERE IS NO QUESTION.

BY MR. FISHBACK:

Q. YOU WORK FOR DANA CORPORATION; CORRECT?

A. CORRECT.

Q. HAVE YOU EVER WORKED FOR VICTOR GASKET COMPANY?

A. NO.

Q. WHAT IS YOUR UNDERSTANDING OF THE RELATIONSHIP BETWEEN THE TWO?

A. DANA CORPORATION IS THE CORPORATION MADE UP OF MULTIPLE DIVISIONS OF WHICH THE SEALING PRODUCTS DIVISION, FORMERLY VICTOR REINZE, FORMERLY VICTOR PRODUCTS DIVISION, IS ONE OF THOSE DIVISIONS. DANA CORPORATION IS PEOPLE, NOT PRODUCTS. PRODUCTS ARE MADE AT

THE DIVISIONS.

Q. ALL RIGHT. SO DANA CORPORATION NEVER MANUFACTURED A GASKET?

A. THAT'S CORRECT.

Q. IT HAD DIVISIONS THAT MANUFACTURED GASKETS?

A. THAT'S CORRECT.

Q. ALL RIGHT. DANA CORPORATION DOESN'T MANUFACTURE ANYTHING, DOES IT?

A. CORRECT.

Q. BUT THERE ARE EMPLOYEES OF DANA CORPORATION?

A. YES.

Q. AND ARE THERE SIMPLY EMPLOYEES OF VICTOR CORPORATION OR VICTOR COMPANY, THE VARIOUS DIVISIONS?

MR. PARKER: WAIT. THAT'S THREE QUESTIONS. WHICH ONE DO YOU WANT HER TO ANSWER? OTHER EMPLOYEES OF THE DIVISIONS?

MR. FISHBACK: YES.

MR. PARKER: DO YOU UNDERSTAND THAT?

THE WITNESS: YES. AND WE ALL WORK FOR DANA CORPORATION.

BY MR. FISHBACK:

Q. WHEN YOU STARTED IN 1968, YOU WERE EMPLOYED BY DANA CORPORATION?

A. DANA CORPORATION AND THE SERVICE PARTS DIVISION.

Q. OF DANA CORPORATION?

A. DANA CORPORATION.

Q. WHEN YOU GOT YOUR PAYCHECK, DID IT SAY "DANA CORPORATION" ON IT?

A. PROBABLY.

MR. PARKER: IF YOU --

THE WITNESS: YES, WITH SEALING -- WITH THE DIVISION NAME.

BY MR. FISHBACK:

Q. ALL RIGHT. WHEN YOU GET YOUR PAYCHECK TODAY, DOES IT SAY JUST "DANA CORPORATION" ON IT?

A. NO.

Q. IT INCLUDES THE DIVISION AS WELL?

A. YES. BUT I DON'T GET A PAYCHECK. IT'S AUTOMATIC DEPOSIT.

Q. OKAY. YOU GET PAID, DON'T YOU?

A. YES.

Q. INCIDENTALLY, ON THE ISSUE OF PAYMENT, YOUR FULL-TIME JOB ISN'T OBVIOUSLY TO BE A WITNESS, AS YOU ALREADY INDICATED, BUT YOU'RE GETTING PAID TODAY BY DANA