

3 Q. SOME TIME AFTER THE LATE 1950'S OR LATE 1960'S?

4 A. YES.

5 Q. WHAT WAS THE RESPONSIBILITY OF THE NATIONAL
6 ACCOUNTS DIVISION?

7 A. THEY WERE ALSO A GROUP OF SALES PEOPLE ONLY
8 THAT SOLD DANA DIVISION PRODUCTS TO A SPECIFIC MARKET.

9 MR. PARKER: COUNSEL, SHE TESTIFIED TO ALL OF
10 THAT ALREADY. SHE TESTIFIED TO PARTS CRAFT, NATIONAL
11 ACCOUNTS, PRIVATE BRANDS, WHAT THEY DID AND SO
12 ON.

13 MR. FISHBACK: WE DIDN'T GET TO THE WHAT THEY
14 DID PART.

15 MR. PARKER: WELL, IT WAS THE AFTERMARKET
16 SALES.

17 GO AHEAD.

18 BY MR. FISHBACK:

19 Q. MORE SPECIFIC THAN AFTERMARKET SALES -- THESE
20 ARE ALL AFTERMARKET SALES DIVISIONS?

21 A. GROUPS.

22 Q. GROUPS. IN TERMS OF THE AFTERMARKET SALES
23 GROUP, CAN YOU BE MORE SPECIFIC ABOUT WHAT THEIR FUNCTION
24 WAS?

25 MR. PARKER: THAT'S VAGUE AND AMBIGUOUS AS

0160

1 PHRASED.

2 BY MR. FISHBACK:

3 Q. DO YOU UNDERSTAND MY QUESTION?

4 A. THEY WERE SALES -- A SALES GROUP THAT SOLD
5 VICTOR AND OTHER DANA PRODUCTS TO A SPECIFIC MARKET.

6 Q. WHAT'S A "SPECIFIC MARKET"?

7 A. I'M NOT REAL GOOD WITH MARKETING. OKAY.

8 MR. PARKER: WELL, THE QUESTION IS WHAT DO YOU
9 MEAN BY "A SPECIFIC MARKET"?

10 THE WITNESS: A SPECIFIC SET OF CUSTOMERS IN A
11 PARTICULAR MARKET.

12 BY MR. FISHBACK:

13 Q. CAN YOU GIVE ME SOME EXAMPLES?

14 A. OH, JEEZ.

15 MR. PARKER: IF YOU CAN'T, THAT'S FINE.

16 THE WITNESS: I CAN CATEGORIZE IT FOR YOU THIS
17 WAY. AFTERMARKET SALES, PARTS CRAFT SOLD TO ONE CUSTOMER
18 ONLY, ONE CUSTOMER GROUP ONLY AND THAT WAS NAPA.

19 NATIONAL ACCOUNTS SOLD TO EVERYBODY ELSE BASICALLY.

20 BY MR. FISHBACK:

21 Q. OKAY.

22 A. IN THE AFTERMARKET REGION.

23 MR. DUPLANTY: TODD DUPLANTY, RESPECTFULLY MOVE
24 TO STRIKE THAT RESPONSE AS BASED ON SPECULATION.

25 BY MR. FISHBACK:

0161

1 Q. HOW DO YOU KNOW THAT THE PARTS CRAFT DIVISION
2 SOLD ONLY TO NAPA?

3 MR. DUPLANTY: OBJECTION; LACKS FOUNDATION,
4 CALLS FOR SPECULATION, AND VAGUE, AMBIGUOUS, AND ASSUMES
5 FACTS NOT IN EVIDENCE.

6 THE WITNESS: PERSONAL KNOWLEDGE OF WORKING FOR
7 THE COMPANY DURING THAT TIME.

8 BY MR. FISHBACK:

9 Q. AND HOW DO YOU KNOW THAT THE NATIONAL ACCOUNTS
10 DIVISION SOLD TO EVERYONE ELSE EXCEPT NAPA?

11 A. PERSONAL KNOWLEDGE OF WORKING FOR THE COMPANY
12 DURING THAT TIME.

13 Q. DO YOU KNOW IF THE PARTS CRAFT DIVISION WAS IN