MR. CORCORAN: STEVE CORCORAN. OVERBROAD, LACKS FOUNDATION, CALLS FOR SPECULATION, VAGUE AND AMBIGUOUS.
MR. PARKER: JOIN IN THE OBJECTIONS.
TO THE EXTENT YOU CAN ANSWER --
THE WITNESS: I DID NOT KNOW.
BY MR. FISHBACK:
Q. HOW DID YOU -- HOW DID YOU KNOW THAT F.S. 1178 WAS A POPULAR GASKET KIT FOR CHEVYS? WHY DID YOU SAY IT WAS POPULAR?
MR. PARKER: MISSTATES --
MR. CORCORAN: STEVE CORCORAN. VAGUE AND AMBIGUOUS, LACKS FOUNDATION, CALLS FOR SPECULATION.
MR. PARKER: MISSTATES TESTIMONY.
YOU CAN EXPLAIN YOUR ANSWER.
THE WITNESS: JUST FROM EXPERIENCE AND KNOWLEDGE OVER THE YEARS IS HOW I KNEW WHAT IT GOES FOR, AND THAT IT WAS PROBABLY ONE OF OUR MORE POPULAR KITS.
BY MR. FISHBACK:
Q. WERE THERE OTHER KITS THAT YOU WOULD INCLUDE IN

0046

THE MORE POPULAR CATEGORY OTHER THAN F.S. 1178 FOR CHOOSING THE SMALL BLOCK CHEVY DURING THAT TIME FRAME '68 TO '70?
A. NO.
MR. PARKER: SAME OBJECTIONS.
GO AHEAD.
THE WITNESS: NO.
BY MR. FISHBACK:
Q. YOU CAN'T IN ANY WAY RATE THE AMOUNT OF SALES ON F.S. 1178 AS COMPARED WITH OTHER GASKET KITS DURING THAT TIME, CAN YOU?
A. NO, I COULD NOT.
Q. WHO WOULD BE ABLE TO DO THAT?
LET ME ASK A DIFFERENT QUESTION. IF YOU WANTED TO FIND OUT ABOUT THE AMOUNT OF SALES OF GASKET KITS FROM THE CHURUBUSCO, INDIANA, FACILITY DURING THE TIME PERIOD 1968 TO 1970; HOW WOULD YOU OBTAIN THAT INFORMATION?
A. I'D PROBABLY START WITH INFORMATION THAT'S AVAILABLE IN THE REPOSITORY FOR ANY SALES RECORDS. I DON'T THINK THERE IS ANYTHING LEFT -- IN CHURUBUSCO LEFT ANYMORE HISTORICAL. I WOULD PROBABLY START AT THE REPOSITORY.
Q. AT THE REPOSITORY -- STRIKE THAT.
ACTUALLY, DANA'S PRODUCTS ARE ORGANIZED BY PART

0047

NUMBER; IS THAT CORRECT?
A. YES.
Q. THAT IS HOW THEY'RE FILED; IS THAT RIGHT?
A. YES.
Q. IS THERE A KEY OR LEDGER THAT SORT OF ALLOWS YOU TO FACILITATE WHAT AN F.S. 1178 IS? FOR EXAMPLE, SAY ON ONE SIDE OF THE SHEET, IT SAYS "F.S. 1178" AND THEN IT SAYS, "DESCRIPTION, SMALL BLOCK CHEVY GASKET KIT"? IS THERE SOMETHING THAT EXISTS LIKE THAT?
MR. PARKER: COUNSEL, THAT'S OUTSIDE THE SCOPE OF THIS DEPOSITION. SHE IS PREPARED TO TALK ABOUT CATEGORY 33, WHICH IS THE RETENTION POLICY. BUT SHE'S NOT HERE TO BE TALKING ABOUT EXACTLY HOW THE RECORDS WERE KEPT AND MAINTAINED OR THAT SORT OF QUESTION THAT YOU'RE ASKING IS AWFULLY --
MR. FISHBACK: SHE'S HERE TO TALK ABOUT THE