

18 AN O.E. SERVICE LOCATION, A RAW MATERIAL CUSTOMER.
19 SO WHEN I GET A SALES REPORT, I GET A REPORT OF
20 ALL MY CUSTOMERS BROKEN DOWN BY -- THESE ARE ALL MY
21 O.E.M. CUSTOMERS, THESE ARE ALL MY O.E. SERVICE
22 CUSTOMERS; AND THEN I -- I ALSO GET THE SAME TYPES OF
23 REPORTS FOR THE OTHER ACCOUNT MANAGERS AND GIVE THEM
24 THEIRS.

25 Q. IS THE INFORMATION CONTAINED IN THOSE REPORTS
0283 INCLUDED IN THE TIME PERIOD OF 1959 TO 1980?

1 A. NO.

2 Q. WHEN DOES THE INFORMATION BEGIN, THE EARLIEST
3 DATE?

4 A. 1988 -- NO. JANUARY 1ST, 1989.

5 Q. WHAT DOES BORGWARNER PURCHASE FROM VICTOR DANA?
6 MR. SABNIS: THIS IS ROHIT SABNIS. LACKS
7 FOUNDATION AND CALLS FOR SPECULATION.

8 MR. PARKER: THIS IS RELATED TO VICTOR
9 GASKETS. THE TOPIC IS VICTOR GASKETS AS SOLD TO
10 BORGWARNER. YOU CAN ASK ABOUT THAT, NOT ALL PRODUCTS.
11 BY MR. FISHBACK:

12 Q. OKAY. DOES BORGWARNER PURCHASE GASKETS FROM
13 VICTOR DANA?

14 A. YES.

15 MR. SABNIS: SAME OBJECTIONS. SABNIS.
16 BY MR. FISHBACK:

17 Q. HOW LONG HAVE THEY BEEN A CUSTOMER?

18 A. I DON'T KNOW HOW LONG. THEY'RE ONE OF MY
19 ACCOUNTS. ANOTHER ONE OF MY ACCOUNTS ACTUALLY.

20 Q. DID YOU INHERIT THE ACCOUNT WHEN YOU BECAME A
21 PART OF THE SALES DEPARTMENT?

22 A. YES.

23 Q. SO YOU HAVE NO ESTIMATION OF HOW LONG THEY'VE
24 BEEN A CUSTOMER OF DANA?

25 A. NO.

0284 1 Q. DO YOU HAVE ANY SPECIFIC INFORMATION ABOUT
2 MAREMONT CORPORATION OTHER THAN THE NAME SOUNDS FAMILIAR?

3 A. THAT'S IT. I'D HAVE TO RESEARCH THAT ONE.

4 Q. WHAT INFORMATION DO YOU HAVE ABOUT PARKER
5 HANNIFIN CORPORATION?

6 A. THEY'RE ANOTHER ONE OF MY MISCELLANEOUS
7 ACCOUNTS. THEY'VE BEEN A CUSTOMER FOR MANY YEARS. THEY
8 BUY SOME GASKETS FROM US.

9 Q. HAVE YOU SPOKEN WITH ANYONE IN THE COMPANY
10 ABOUT THE SUPPLY OF GASKETS TO ANY OF THE OTHER COMPANIES
11 LISTED IN EXHIBIT B?

12 MR. PARKER: AT ANY TIME HAS SHE SPOKEN TO
13 ANYBODY?

14 MR. FISHBACK: YES.

15 MR. SABNIS: OVERBROAD; COMPOUND. SABNIS.

16 MR. PARKER: IT'S A YES OR NO, AND HE WILL ASK
17 FOR FOLLOW-UP IF HE WANTS TO.

18 THE WITNESS: EVER IN MY WHOLE LIFE?

19 BY MR. FISHBACK:

20 Q. YES.

21 A. YES.

22 Q. WHO ELSE OTHER THAN THE COMPANIES THAT YOU'VE
23 LISTED, WHAT OTHER COMPANIES HAVE YOU DISCUSSED ON
24 EXHIBIT B?

0285 1 MR. PARKER: I'LL OBJECT. CAN YOU REPHRASE
2 IT? MAYBE I MISSED IT.