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THE WITNESS: THEY'RE PAYING A PENSION OUT. I DON'T KNOW.
BY MR. FISHBACK:
Q. IF YOU WOULD LIKE TO FIND OUT ABOUT PAST EMPLOYEES OF VICTOR DANA, WITH WHOM WOULD YOU CONSULT?
A. IT WOULD DEPEND ON WHAT I WOULD WANT TO KNOW.
Q. OKAY.
A. AN EXAMPLE WOULD BE THAT I HAVE A RETIREE THAT WORKS PART TIME FOR ME, AND SHE MAY KNOW WHERE SO AND SO IS, JUST PERSONAL-TYPE INFORMATION.
Q. SO YOU MIGHT ASK SOMEONE -- FIRST, YOU WOULD START OUT WITH SOMEONE ON YOUR OWN STAFF PERHAPS?
A. UH-HUH.
Q. OKAY. IF YOU WANTED TO FIND OUT SPECIFICALLY ABOUT THE PRIOR -- THE INDIVIDUALS WHO PREVIOUSLY WERE IN THE SALES -- WHO WERE PREVIOUSLY SALES PEOPLE IN THE PARTS CRAFT DIVISION --
A. UH-HUH.
MR. PARKER: WHEN YOU SAY "FIND OUT," SHE NEEDS TO KNOW WHAT YOU WANT TO KNOW.
BY MR. FISHBACK:
Q. IF YOU WANTED TO KNOW THEIR NAMES, FOR EXAMPLE --
A. UH-HUH.
Q. -- WHO WOULD YOU ASK OR WHERE WOULD YOU SEARCH?

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IS THIS SOMETHING YOU'VE EVER BEEN ASKED?
A. NO.
Q. IS THIS SOMETHING THAT YOU'VE EVER ATTEMPTED TO DO?
A. NO.
MR. PARKER: OBJECTION; IT CALLS FOR SPECULATION, LACKS FOUNDATION.
AND AT THIS POINT, IF YOU HAVE TO GUESS TO DO IT, TELL HIM YOU WOULD BE GUESSING.
THE WITNESS: I WOULD BE GUESSING. I WOULD GO SOMEWHERE CORPORATE. I DON'T KNOW.
BY MR. FISHBACK:
Q. IF YOU WERE TO GO SOMEWHERE CORPORATE, YOU MEAN SOMEWHERE IN TOLEDO?
A. YES.
Q. WOULD YOU TALK WITH THE PENSION PEOPLE?
A. I WOULD TRY WITH H.R., CORPORATE H.R.
Q. DO YOU KNOW WHO IS IN CHARGE OF CORPORATE H.R.?
A. NO.
Q. YOU WORK IN THE SALES DIVISION AREA NOW?
A. SALES OPERATIONS.
Q. SALES OPERATIONS?
A. UH-HUH.
Q. DO YOU HAVE SOME KIND OF YEARLY GET TOGETHERS WITH YOUR EMPLOYEES JUST IN YOUR DIVISION?

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A. NOT THE WHOLE DIVISION, NO.
Q. OKAY. DID YOU EVER HAVE GET TOGETHERS IN YOUR DIVISION WHERE RETIREES ARE PRESENT?
A. YES.
Q. HOW DO YOU CONTACT THOSE INDIVIDUALS?
MR. PARKER: ASSUMES FACTS NOT IN EVIDENCE.
MR. FISHBACK: WELL, STRIKE THAT.
Q. THEY DON'T -- DO YOU KNOW HOW THEY JUST SHOW UP AT THESE FUNCTIONS?
A. THE HUMAN RESOURCE DEPARTMENT IS RESPONSIBLE