

9 A. FOGELSVILLE, PENNSYLVANIA.
10 MR. FISHBACK: OKAY.
11 MR. PARKER: THIS IS THAT 20-YEAR PERIOD, FROM
12 THE 1960'S TO THE 1980'S?
13 THE WITNESS: YES.
14 MR. PARKER: OKAY.
15 THE WITNESS: THESE FACILITIES DIDN'T EXIST IN
16 THE 60'S. THEY DIDN'T EXIST UNTIL THE LATE '70S, IN THE
17 MID TO LATE '70S.
18 BY MR. FISHBACK:

19 Q. OKAY.
20 A. AND ARE NO LONGER IN EXISTENCE TODAY, AND I
21 CAN'T TELL YOU THE DAY, YOU KNOW, EXACTLY WHEN THEY
22 CLOSED THESE FACILITIES.
23 Q. OKAY.
24 A. ATHENS, GEORGIA; CLEVELAND, TENNESSEE, MANTECA,
25 CALIFORNIA; AND THEN THERE WERE 23 SMALL REGIONAL

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1 BRANCHES, WE CALL THEM, THAT WOULD SUPPLY AFTERMARKET
2 CUSTOMERS IN A REGIONAL AREA LIKE A STATE OR A COUPLE
3 STATE AREA.
4 I CAN'T TELL YOU ALL OF THEM. JUST A FEW.
5 SEATTLE; CITY OF INDUSTRY, CALIFORNIA; PHOENIX, ARIZONA;
6 DENVER, COLORADO; HOUSTON, TEXAS; NEBRASKA -- WHERE IS
7 THAT? THERE'S ONE IN NEBRASKA. I DON'T REMEMBER THE
8 TOWN. BELMONT, ILLINOIS; DETROIT AREA; AND I CAN'T
9 REMEMBER WHERE THE REST OF THEM WERE.

10 Q. THE CHURUBUSCO -- WAS ANY ONE OF THOSE
11 DISTRIBUTION CENTERS THAT YOU JUST REFERENCED THE -- SAY
12 CENTRAL DISTRIBUTION OR THE LARGEST ONE IN SOME WAY?

13 A. CHURUBUSCO, INDIANA, WAS THE BASE DISTRIBUTION
14 CENTER AND PACKAGING CENTER.

15 Q. WERE THE OTHERS PACKAGING CENTERS AS WELL OR
16 JUST DISTRIBUTION?

17 A. DISTRIBUTION.

18 Q. SO ALL OF VICTOR'S AFTERMARKET PRODUCTS HAD TO
19 GO THROUGH CHURUBUSCO?

20 A. YES.

21 Q. AND FROM THERE, THEY WERE FANNED OUT ACROSS THE
22 COUNTRY?

23 A. DISBURSED, YES, TO THE OTHER FACILITIES.

24 Q. FOR HOW LONG HAD VICTOR OR DANA, HAD THEY BEEN
25 A NATIONAL PRESENCE? IN OTHER WORDS, PRODUCTS ARE

0122
1 AVAILABLE COAST TO COAST?

2 MR. PARKER: I'LL OBJECT THAT IT LACKS
3 FOUNDATION, CALLS FOR SPECULATION, IT'S VAGUE AND
4 AMBIGUOUS AS PHRASED.

5 THE WITNESS: I DON'T KNOW.

6 BY MR. FISHBACK:

7 Q. IN THE LATE 1960'S WHEN YOU STARTED WITH THE
8 COMPANY, WAS IT YOUR UNDERSTANDING THAT VICTOR DANA HAD A
9 NATIONAL PRESENCE?

10 MR. PARKER: SAME OBJECTIONS. AND SHE JUST
11 STATED THAT SHE DOESN'T KNOW HOW TO ANSWER YOUR QUESTION.
12 BUT IF YOU CAN.

13 THE WITNESS: WE SOLD NATIONALLY OUT OF
14 CHURUBUSCO. THERE WEREN'T OTHER BRANCHES AT THAT TIME.

15 BY MR. FISHBACK:

16 Q. I UNDERSTAND. IS THERE A LOCATION IN THE
17 UNITED STATES THAT YOU KNOW OF THAT -- WHERE YOU COULDN'T
18 GET A DANA OR VICTOR GASKET?

19 MR. PARKER: SAME OBJECTIONS AS BEFORE.