MR. FISHBACK: YES. HER EXPERIENCE.
MR. PARKER: YEAH.
THE WITNESS: YES.

BY MR. FISHBACK:
Q. BECAUSE BEFORE THAT, YOU EITHER DIDN'T KNOW WHO THE CUSTOMERS WERE WHEN YOU WERE DEALING WITH THE -- WHEN YOU WERE RECORDS CLERK, YOU DIDN'T KNOW WHO THE CUSTOMERS WERE; CORRECT?
A. MR. PARKER: AT THE TIME THAT I WAS PERFORMING THE INVENTORY RECORDS CLERK, I WAS NOT COGNIZANT OF WHO THE SPECIFIC CUSTOMERS WERE AT THAT TIME, NO.
Q. AND WHEN YOU WERE WORKING AT THE OIL SEAL MANUFACTURING PLANT, YOU DIDN'T KNOW WHO THE CUSTOMERS WERE WITH RESPECT TO THE GASKETS THAT VICTOR WAS PRODUCING; RIGHT?
A. THAT'S CORRECT.
Q. OKAY. AND SO YOUR OWN PERSONAL KNOWLEDGE REALLY STARTS IN THE MID 1980'S AT THE EARLIEST?
A. ON DAY-TO-DAY BUSINESS, YES.
Q. AND THEN, SINCE THAT TIME, HAVE YOU MADE IT A POINT TO EDUCATE YOURSELF ABOUT THE EXTENT OF VICTOR DANA'S CUSTOMERS WITH RESPECT TO THE SUPPLY -- VICTOR'S SUPPLY OF ASBESTOS-CONTAINING OR JUST GASKETS IN GENERAL?
MR. PARKER: OBJECT TO THE PHRASE "MADE IT A POINT" TO DO THAT. IT'S VAGUE AND AMBIGUOUS AND PERHAPS MISLEADING.
GO AHEAD.

THE WITNESS: PART OF MY JOB AS SALES OPERATIONS MANAGER INVOLVES A LOT OF THE SALES HISTORY FOR CUSTOMERS. AS I MENTIONED EARLIER, WE WILL GET CALLS FROM CUSTOMERS WHO BOUGHT GASKETS FROM US 20, 30, 40 YEARS AGO TO TRY TO CROSS-REFERENCE. SO WE HAVE DONE A LOT OF DISCUSSIONS AND HELPING AND HAVING TO LOOK UP INFORMATION IN REGARDS TO THAT. AND THOSE TYPES OF EXPERIENCES HAVE BUILT ON THE KNOWLEDGE PACKAGE THAT I CURRENTLY HAVE.
BY MR. FISHBACK:
Q. SO WHEN I ASKED YOU WHO WERE VICTOR'S AFTERMARKET CUSTOMERS FOR GASKETS DURING THE YEARS '59 TO '80, YOU COULDN'T TELL ME WHO ANY OF THOSE WERE EXCEPT FOR NAPA. DO YOU REMEMBER ANY OF THAT TESTIMONY?
A. I REMEMBER TALKING ABOUT THAT, YES.
Q. HAS YOUR TESTIMONY NOW CHANGED, YOU RECALL SOME AFTERMARKET CUSTOMERS OF VICTOR'S FOR THE YEARS 1959 TO THE YEARS 1980 FOR THE GASKETS?
A. THE -- NO. I WENT TO WORK FOR DANA IN 1968, AND I KNOW THAT MANY OF THE CUSTOMERS THAT WE SOLD TO FROM THAT PERIOD ON HAD BEEN LONG-TERM CUSTOMERS BECAUSE OF LOOKING AT THE MICROFICHE, THERE WERE NAMES ON THERE THAT I'VE LOOKED AT MICROFICHE FROM THE -- THAT GOES BACK TO THE '40S THAT ARE STILL CUSTOMERS TODAY.
Q. SO YOU'RE TELLING ME THAT --

A. SO I'M -- IN WHAT CAPACITY? LIKE I HAVE SEEN GENERAL MOTORS ON THE CARDS. I STILL SELL TO GENERAL MOTORS. THE -- LIKE THE FORD COMPANY, THINGS LIKE THAT. THOSE ARE STILL CUSTOMERS OF OURS TODAY. SO EVEN THOUGH I DID NOT WORK FOR VICTOR IN 1959, I'VE HAD THE OPPORTUNITY TO LEARN, THROUGH LOOKING AT MICROFICHE AND SALES RECORDS AND HAVING THIS INFORMATION IN MY