Q. YOU SAID THERE WAS A PENSION GROUP. WHAT KNOWLEDGE DO YOU HAVE OF THE PENSION GROUP?
A. I DON'T KNOW WHO AT CORPORATE IS -- ADMINISTERS

0135

THERE. FOR ANY ASSISTANCE WE HAVE AT OUR DIVISION, WE GO THROUGH OUR DIVISION H.R. DIRECTOR.
Q. WITH RESPECT TO THE PAST EMPLOYEE RECORDS, IS IT YOUR UNDERSTANDING THAT DANA MAINTAINS FILES ON ITS PAST EMPLOYEES?
A. I DON'T KNOW.
MR. PARKER: COUNSEL, THAT GOES BEYOND THE SCOPE. SHE'S HERE FOR THE SUPPLY OF VICTOR GASKETS, PARTICULARLY. NOW YOU'RE ASKING ABOUT EMPLOYEE RECORDS. IT'S GONE BEYOND THE SCOPE OF THIS DEPOSITION,
MR. FISHBACK: TO THE EXTENT THAT SHE CAN ANSWER MY QUESTIONS, I'M ALLOWED TO ASK OTHER QUESTIONS --
MR. PARKER: YOU MAY, BUT NONE OF THAT -- THAT CATEGORY IS NOT INCLUDED ANYWHERE IN THE CATEGORIES WE STIPULATED.
MR. FISHBACK: TO THE EXTENT THAT SHE HAS NOT BEEN ABLE TO ANSWER ANY ONE OF MY QUESTIONS TODAY, I'M ENTITLED TO ASK HER WHO MAY HAVE THAT INFORMATION AND WHERE CAN I GET THAT INFORMATION.
MR. PARKER: NO. YOU'RE ASKING NOW ABOUT A CATEGORY OF INFORMATION WHICH IS NOT INCLUDED ANYWHERE IN THE CATEGORIES OF THE P.M.K. DEPOSITION.
MR. FISHBACK: I'M NOT ASKING ABOUT A CATEGORY OF INFORMATION. I'M ASKING ABOUT --

0136

MR. PARKER: THAT'S KIND OF MY POINT.
MR. FISHBACK: MY POINT IS THAT I'M ALLOWED TO INQUIRE AS TO WHO ELSE MIGHT HAVE INFORMATION, AND SHE'S JUST TOLD ME THAT DANA CORPORATION MAINTAINS EMPLOYEE RECORDS.
MR. PARKER: YES. AS TO TOPICS COVERED BY THIS DEPOSITION.
MR. FISHBACK: THANK YOU.
MR. PARKER: THAT TOPIC ISN'T COVERED BY THIS DEPOSITION.
MR. FISHBACK: SHE HAS NOT BEEN ABLE TO ANSWER ALL OF THE QUESTIONS I'VE ASKED. AND TO THAT EXTENT, IF THERE ARE OTHERS WHO ARE AWARE OR OTHERS WHO ARE KNOWLEDGEABLE, I'M ENTITLED TO INQUIRE AS TO THIS DEPOSITION.
MR. PARKER: AS TO THE CATEGORIES THAT ARE COVERED BY THIS DEPOSITION. IF YOU GO OUTSIDE THE DEPOSITION CATEGORIES, THEN YOU'RE NOT.
MR. FISHBACK: I UNDERSTAND.
BY MR. PARKER:
Q. DO YOU KNOW?
MR. PARKER: EXCUSE ME. COUNSEL, CATEGORY OF EMPLOYEE RECORDS IS NOT IN HERE.
MR. FISHBACK: COUNSEL, YOU'RE MISSING MY POINT. AND ONCE AGAIN, YOU'RE FAILING TO UNDERSTAND THE

0137

SCOPE OF DISCOVERY AND IT'S VERY BROAD. IT'S NOT LIMITED TO THESE CATEGORIES.
MR. PARKER: YES, IT IS IN THIS DEPOSITION.
MR. FISHBACK: OH, NO, IT'S NOT.
MR. PARKER: YES, IT IS.
MR. FISHBACK: NO, IT'S NOT.
MR. PARKER: COUNSEL, LET ME FINISH. WE HAD