

20 MR. FISHBACK: I'M NOT ARGUING WITH HER.
21 MR. PARKER: YOU SAID IT MUST BE THE CASE THAT
22 THIS HAPPENED.
23 MR. FISHBACK: YES.
24 MR. PARKER: THAT'S AN ARGUMENT.
25 MR. FISHBACK: I'M NOT GOING TO ARGUE WITH
0186 YOU.
1 MR. PARKER: JUST ASK HER A QUESTION.
2 BY MR. FISHBACK:
3 Q. DO YOU HAVE MY QUESTION IN MIND, OR DO YOU WANT
4 ME TO RE-ASK IT?
5 A. TELL ME THE QUESTION AGAIN.
6 Q. THE FIRST QUESTION IS IS THERE SOME OTHER
7 LOCATION WHERE THE PART NUMBER IS REFERENCED WITH A
8 SPECIFIC APPLICATION?
9 A. YES AND NO. NOT -- I DON'T MEAN TO SOUND
10 AMBIGUOUS HERE. THE O.E.M. CUSTOMER -- CHEVROLET, G.M.,
11 WHOEVER -- HAVE US MAKE A PART FOR THEM. THEY HAVE A
12 PART NUMBER THAT THEY REFERENCE IN THEIR SYSTEM --
13 HOWEVER THEY DO IT. I DON'T KNOW -- THAT IT WOULD GO FOR
14 THIS SPECIFIC APPLICATION.
15 I HAVE A NUMBER. OKAY. IN SALES WE HAVE
16 CROSS-REFERENCE FILES, HIS NUMBER TO MY NUMBER. MY
17 PEOPLE DON'T NECESSARILY KNOW WHAT KIND OF GASKET IT IS
18 OR WHAT IT FITS.
19 I CAN GO TO THE ENGINEERING FOLDER FROM MY
20 NUMBER AND LOOK AT THE DRAWING, AND IF I KNOW WHAT A HEAD
21 GASKET LOOKS LIKE, I CAN TELL YOU THAT IT'S A HEAD
22 GASKET. I DON'T KNOW WHAT IT'S FOR BECAUSE MY CUSTOMER
23 DOESN'T ALWAYS TELL ME WHAT IT'S FOR.
24 Q. RIGHT.
25
0187 A. SO THAT INFORMATION MAY OR MAY NOT BE IN THE
1 ENGINEERING FOLDER.
2 Q. WHO DESIGNS -- WHO PUTS TOGETHER THE CATALOGS?
3 A. IT WOULD BE THE PRODUCT PLANNING GROUP --
4 Q. OKAY.
5 A. -- IS THE GROUP THAT PUTS TOGETHER THE
6 CATALOGS.
7 Q. WHO'S IN CHARGE OF THE PRODUCT PLANNING GROUP?
8 MR. PARKER: AT WHAT POINT IN TIME?
9 MR. FISHBACK: ANY TIME. IT DOESN'T MATTER
10 WHEN, I JUST NEED TO KNOW.
11 MR. PARKER: IT MATTERS TO ME.
12 1959 TO 1980, DO YOU KNOW SOMEONE WHO WAS IN
13 CHARGE AT THAT TIME?
14 MR. FISHBACK: I DON'T NEED SOMEONE AT THAT
15 TIME. IF SOMEONE IS IN CHARGE OF THE PRODUCT PLANNING
16 GROUP, THEY CAN TALK ABOUT CATALOGS DURING -- WHETHER
17 THEY'RE IN CHARGE NOW OR BEFORE.
18 MR. PARKER: IT MAY OR MAY NOT BE TRUE. YOU
19 HAVEN'T LAID ANY FOUNDATION.
20 THE WITNESS: THE PRODUCT PLANNING GROUP IS
21 PART OF THE CLEVITE ENGINE PARTS GROUP.
22 BY MR. FISHBACK:
23 Q. ALL RIGHT. HERE'S THE SCENARIO. I'VE GOT A
24 WHOLE LOT OF PART NUMBERS.
25
0188 A. ALL RIGHT.
1 Q. BOXES OF PART NUMBERS, REFERENCED PART NUMBERS,
2 AND I DON'T HAVE THE VEHICLES THAT THE PARTS CORRESPONDED
3 TO, AND THE CONCERN I HAVE AND WHAT I'M TRYING TO
4