

16 A. NO. THE CATALOGS ARE MADE BY THE SAME PEOPLE.
17 Q. TO YOUR KNOWLEDGE, HAVE THE CATALOGS ALWAYS
18 BEEN MADE BY THE PRODUCT PLANNING GROUP?
19 A. AS FAR BACK AS I KNOW, YES.
20 Q. AND HAS THE PRODUCT -- I'M SORRY. HAS THE
21 CLEVITE ENGINE PARTS GROUP ALWAYS BEEN UNDER THE UMBRELLA
22 OF THE PRODUCT PLANNING GROUP?
23 A. NO. IT'S THE OTHER WAY AROUND.
24 Q. OKAY.
25 A. ONLY THE PRODUCT PLANNING GROUP HAS BEEN UNDER

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1 DIFFERENT NAMED GROUPS. RIGHT NOW, IT'S UNDER THE
2 CLEVITE ENGINE PARTS.
3 Q. DO YOU KNOW WHICH GROUP WAS RESPONSIBLE FOR
4 OVERSEEING THE PRODUCT PLANNING GROUP DURING THE YEARS
5 1959 TO 1990?
6 A. NO.
7 Q. WHO WOULD KNOW THAT INFORMATION?
8 A. WELL, I WOULD -- WOW, I'D PROBABLY START WITH
9 TERRY SHIVELY AND WORK FROM THERE ON.
10 MR. FISHBACK: ALL RIGHT. IT'S 1:45, AND I
11 HAVE A NUMBER OF ADDITIONAL QUESTIONS FOR THE WITNESS,
12 NOT THE LEAST OF WHICH IS PERTAINING TO THE VARIOUS
13 AFTERMARKET CUSTOMERS OTHER THAN NAPA TO WHICH I BELIEVE
14 VICTOR WAS A REGULAR AND CONSISTENT SUPPLIER, AND NOT TO
15 MENTION THE FACT THAT I'VE YET TO HAVE THE OPPORTUNITY TO
16 DEPOSE THIS WITNESS ON ALL OF THE CATEGORIES THAT COUNSEL
17 HAS REPRESENTED SHE IS THE PERSON MOST KNOWLEDGEABLE.
18 THERE ARE SEVERAL AND NUMEROUS DOCUMENTS WHICH
19 I HAVE NOT HAD THE OPPORTUNITY TO DISCUSS WITH
20 MISS DUNCAN INCLUDING THE VARIOUS AND MANY CATALOGS OF
21 WHICH SHE HAS PROFESSED SOME KNOWLEDGE AS WELL AS VARIOUS
22 OTHER DOCUMENTS WHICH WE'VE OBTAINED FROM DANA
23 CORPORATION.

24 THERE ARE ADDITIONAL AREAS OF TESTIMONY WHICH I
25 INTEND TO COVER WITH HER REGARDING HER OWN EMPLOYMENT ACT
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1 AND FOR VICTOR DANA WHICH I HAVEN'T BEEN ABLE TO COVER.
2 AND SO I WILL RECESS THIS DEPOSITION, AND REQUEST COUNSEL
3 TO PROVIDE AN ADDITIONAL DATE AND TIME IN SAN FRANCISCO,
4 THAT THIS WITNESS CAN BE MADE AVAILABLE.

5 MR. PARKER: WELL, LET ME NOTE THAT YOU'VE HAD
6 ALMOST FIVE HOURS. AND YOU'VE HAD PLENTY OF OPPORTUNITY
7 TO DISCUSS ON THE TOPICS WITH HER THAT YOU NEED TO
8 DISCUSS.

9 I BEGAN THIS DEPOSITION BY TELLING YOU THE
10 CATEGORIES THAT SHE WAS THE PERSON MOST KNOWLEDGEABLE
11 FOR, AND YOU CLEARLY CHOOSE TO WADE INTO A NUMBER OF
12 OTHER AREAS WHICH WERE WELL OUTSIDE OF THOSE CATEGORIES,
13 AND DESPITE NUMEROUS OBJECTIONS BY ME ON THAT SUBJECT,
14 YOU CONTINUED TO DO SO.

15 I UNDERSTAND THAT YOU BROUGHT SEVERAL HUNDRED
16 OR A LOT OF C.D.'S HERE. ACTUALLY, YOU CAN SHOW HER ANY
17 DOCUMENT YOU WANT, AND YOU CHOOSE NOT TO SHOW HER A
18 SINGLE DOCUMENT. AND YOU ALSO INSISTED THAT THIS
19 DEPOSITION TAKE PLACE THIS WEEK. SO I HAVE A RIGHT TO
20 ASSUME THAT YOU WERE READY TO GO. IT SOUNDS LIKE YOU
21 WEREN'T. MY QUESTION FOR YOU, THOUGH, BEFORE WE CONCLUDE
22 FOR THE DAY, IS HOW MUCH MORE TIME DO YOU NEED WITH THIS
23 WITNESS?

24 MR. FISHBACK: ANOTHER ONE DAY.
25 MR. PARKER: ONE FULL DAY?

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