

1 A. GARY AUSTIN CAN PROBABLY GIVE YOU A BETTER
2 IDEA. HE'S BEEN WITH VICTOR THE WHOLE TIME HE'S WORKED.

3 Q. ANY OTHER FACILITIES WHERE THEY MANUFACTURE
4 GASKETS BESIDES THE FOUR YOU MENTIONED?

5 A. NOT DURING THAT TIME PERIOD.

6 Q. DO YOU KNOW, OF THOSE GASKETS MANUFACTURING
7 FACILITIES, WHICH WAS THE LARGEST IN TERMS OF YEARLY
8 PRODUCTION?

9 MR. PARKER: OBJECTION TO THE USE OF THE WORD
10 "LARGEST," AND IT'S VAGUE AND AMBIGUOUS AS PHRASED, LACKS
11 FOUNDATION, CALLS FOR SPECULATION ON BEHALF OF THE
12 WITNESS.

13 SHE HASN'T BEEN DESIGNATED ON THIS ISSUE ABOUT
14 THE MANUFACTURING PROCESS. THAT WILL BE SOMEONE ELSE.

15 AND I SHOULD TELL YOU, MR. AUSTIN, BY THE WAY,
16 HAD SOME DEPOSITION OR SOMETHING CANCEL. SO HE CAN BE
17 AVAILABLE SOME TIME IN THE MORNING AS OPPOSED TO THE
18 AFTERNOON WHEN IT WAS ORIGINALLY SET FOR.

19 MR. FISHBACK: OKAY.

20 THE WITNESS: I CAN TELL YOU SQUARE FOOTAGE
21 WHICH WAS THE BIGGEST, BUT I DON'T KNOW AS FAR AS SALES.
22 BY MR. FISHBACK:

23 Q. WHICH WAS THE BIGGEST IN SQUARE FOOTAGE?

24 A. IT WAS THE ORIGINAL CHICAGO FACILITY.

25 Q. OKAY. CAN YOU RANK THE OTHERS AFTER CHICAGO?

0131 1 A. I WOULD SAY CHICAGO, ROBINSON, ST. THOMAS,
2 HAVANA.

3 Q. DO YOU KNOW THE PARTICULAR PRODUCTS THAT WERE
4 BEING MANUFACTURED AT EACH FACILITY?

5 A. GASKETS.

6 Q. OTHER THAN JUST THE FACT THEY WERE GASKETS, DO
7 YOU KNOW WHAT PARTICULAR GASKETS WERE BEING MANUFACTURED
8 WHERE?

9 A. BETWEEN HARD AND SOFT IS ALL I COULD TELL YOU.

10 Q. WHICH ONES? WHERE WOULD THE HARD GASKETS BE
11 MANUFACTURED?

12 A. CHICAGO. I DON'T REALLY KNOW WHAT HAVANA MADE,
13 EXACTLY. CHICAGO MADE MOSTLY HARD GASKETS AND SOME SOFT.
14 ROBINSON WAS MOSTLY SOFT.

15 Q. SOME HARD?

16 A. PROBABLY -- THEY'RE CONSIDERED THE SOFT GASKET
17 MANUFACTURER.

18 Q. OKAY. WHAT ABOUT ST. THOMAS?

19 A. BOTH.

20 Q. DO YOU KNOW, DURING THE YEARS 1959 AND 1980,
21 WHETHER VICTOR WAS MANUFACTURING IN QUANTITY MORE HARD
22 GASKETS THAN SOFT GASKETS?

23 A. NO, I WOULDN'T KNOW.

24 Q. IS THAT SOMETHING MR. AUSTIN WOULD KNOW, IN
25 YOUR MIND?

0132 1 MR. PARKER: CALLS FOR SPECULATION.

2 THE WITNESS: MAYBE.

3 BY MR. FISHBACK:

4 Q. WHO WOULD YOU ASK IF YOU WANTED TO KNOW?

5 A. I WOULD PROBABLY GO TO GARY.

6 Q. THE PARTS CRAFT DIVISION, YOU KNOW WHEN THAT
7 DIVISION WAS IN EXISTENCE?

8 A. NO. I DON'T KNOW THE YEARS.

9 Q. DO YOU KNOW HOW IT DIFFERED FROM THE FUNCTION
10 OF THE SERVICE PARTS DIVISION?

11 A. PARTS CRAFT DIVISION WAS THE ACTUAL SALES