BY MR. FISHBACK:
Q. IN THAT LATE 1960'S PERIOD WHEN YOU STARTED?
A. I WOULD NOT KNOW.
Q. WHO WOULD KNOW THAT INFORMATION?
MR. PARKER: THE QUESTION IS WHO WOULD KNOW WHERE SOMEONE COULD GET A DANA PRODUCT IN THAT TIME FRAME?
MR. FISHBACK: (NO AUDIBLE RESPONSE.)
THE WITNESS: I DON'T KNOW.
BY MR. FISHBACK:
Q. ARE YOU AWARE OF A PARTICULAR MARKET AREA OR REGION OF THE COUNTRY WHERE VICTOR DANA JUST COULDN'T GET INTO THAT MARKET? "NO MATTER HOW MUCH WE TRIED, WE COULD, FOR EXAMPLE, NEVER GET OUR PRODUCTS SOLD IN MAINE"?
A. NO. I DON'T KNOW ANYTHING LIKE THAT.
Q. ALL RIGHT. DO YOU KNOW ABOUT THE QUANTITY OF AFTERMARKET SALES FOR ANY GIVEN YEAR?
A. NO.
Q. IS THERE AN INDIVIDUAL WHO WOULD KNOW THAT, OR WOULD YOU HAVE TO CONSULT RECORDS?
A. SOMEBODY WOULD HAVE TO CONSULT RECORDS. I WOULDN'T KNOW WHAT RECORDS TO CONSULT.
MR. PARKER: OKAY.
BY MR. FISHBACK:
Q. WHERE IS -- STRIKE THAT.
WITH RESPECT TO THE SERVICE PARTS DIVISION, WHAT IS YOUR UNDERSTANDING AS TO WHAT THAT DIVISION WAS RESPONSIBLE FOR?
MR. PARKER: AT WHAT POINT IN TIME?
BY MR. FISHBACK:
Q. DO YOU KNOW WHEN THE SERVICE PARTS DIVISION WAS IN OPERATION?
A. I DON'T KNOW THE PERIOD YEARS. ALL I KNOW IS WHEN I STARTED TO WORK FOR DANA, THAT'S WHERE I WORKED --
Q. OKAY.
A. -- FOR THE FIRST COUPLE OF YEARS.
Q. WHAT WAS THE RESPONSIBILITY OF THE SERVICE PARTS DIVISION?
A. WE WOULD RECEIVE PRODUCTS, OTHER DANA DIVISION MANUFACTURED PRODUCTS RELATING TO VEHICLE REPAIR, SERVICE THE PRODUCTS THAT WE MADE, AUTO PARTS, AND WE WOULD PACKAGE THEM AND SELL THEM.
Q. DID THE SERVICE PARTS DIVISION HAVE A SALES FORCE OF ITS OWN?
A. NO.
Q. DID THE SERVICE PARTS DIVISION HAVE A MANUFACTURING UNIT OF ITS OWN WHEREIN THE AFTERMARKET PRODUCTS WERE MANUFACTURED AND THEN SOLD?
A. NO.
Q. SO, THEN, ALL OF THE PRODUCTS WERE MANUFACTURED AT THE SAME FACILITY. SOME OF THEM MAY HAVE BEEN ULTIMATELY UTILIZED IN O.E.M. OTHERS WERE UTILIZED IN AFTERMARKET?
MR. PARKER: OBJECTION; MISSTATES TESTIMONY ASSUMES FACTS NOT IN EVIDENCE, LACKS FOUNDATION.
TO THE EXTENT YOU CAN ANSWER, GO AHEAD.
THE WITNESS: I CAN ONLY SPEAK FOR THE VICTOR PRODUCTS AND GASKETS WHERE OIL SEALS WERE MADE IN THE FACILITY FOR BOTH MARKETS IN THE SAME FACILITY OR