

2 FULL STAFF THERE ANYMORE. ABOUT EIGHT, EIGHT PEOPLE IN
3 THE BUILDING.

4 Q. ARE YOU AN OFFICER IN DANA CORPORATION?

5 A. NO.

6 Q. IS DANA CORPORATION A PUBLICLY OR PRIVATELY
7 HELD CORPORATION?

8 A. PUBLICLY.

9 Q. ARE YOU A SHAREHOLDER?

10 A. NOT ANYMORE.

11 Q. DOES ANY OF YOUR COMPENSATION -- IS ANY OF IT
12 BASED ON STOCK PERFORMANCE?

13 A. NO.

14 Q. ARE ANY OF YOUR BONUSES BASED ON STOCK
15 PERFORMANCE OF DANA CORPORATION?

16 A. NOT THAT I KNOW OF.

17 Q. OKAY. DO YOU KNOW WHY IT IS THAT YOU'VE BEEN
18 ASKED TO TESTIFY AS THE LEGAL PERSON MOST KNOWLEDGEABLE
19 ON VARIOUS CATEGORIES OF INFORMATION?

20 MR. PARKER: TO THE EXTENT THAT YOU CAN ANSWER
21 THAT WITHOUT GOING INTO DISCUSSIONS WITH ATTORNEYS,
22 THAT'S FINE.

23 THE WITNESS: BECAUSE I'VE BEEN WITH THE
24 COMPANY FOR 35 YEARS AND HAVE SOME KNOWLEDGE.
25 BY MR. FISHBACK:

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1 Q. THERE ARE OTHERS WHO HAVE BEEN IN THE SALES
2 DEPARTMENT LONGER THAN YOU HAVE; CORRECT? YOU'VE
3 MENTIONED, I THINK, ONE OF THEM?

4 A. IN -- YEAH. JEAN HAS BEEN THERE LONGER THAN I
5 HAVE, UH-HUH.

6 Q. THERE ARE OTHERS WHO HAVE BEEN WITH DANA
7 CORPORATION LONGER THAN YOU HAVE; CORRECT?

8 A. OH, YES.

9 Q. THERE ARE OTHERS WHO HAVE MORE INFORMATION
10 ABOUT THE SUPPLY OF GASKETS TO NAPA THAN YOU DO; CORRECT?

11 A. YES.

12 Q. THERE ARE OTHERS WHO HAVE MORE INFORMATION
13 ABOUT THE SUPPLY -- AND PARTICULARLY THE YEARS 1959 TO
14 1980, RIGHT, THERE ARE OTHERS WHO HAVE MORE KNOWLEDGE
15 THAN YOU ABOUT THE SUPPLY OF GASKETS TO NAPA?

16 MR. PARKER: ASKED AND ANSWERED.

17 BUT TO THE EXTENT THAT YOU BELIEVE -- WELL,
18 WITHOUT SPECULATING OR GUESSING, YOU MAY ANSWER IT.

19 THE WITNESS: THERE WOULD HAVE TO BE, I WOULD
20 THINK.

21 BY MR. FISHBACK:

22 Q. WELL, OKAY. CONSIDERING THAT SAME TIME PERIOD,
23 THERE ARE OTHERS.

24 MR. PARKER: THAT'S FINE. I'LL MOVE TO STRIKE
25 AS BASED ON SPECULATION.

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1 IF IT'S AN ASSUMPTION, TELL HIM IT'S AN
2 ASSUMPTION, BUT OTHERWISE, IT MAY BE MISLEADING.

3 BY MR. FISHBACK:

4 Q. LET ME ASK THIS QUESTION. WHY DO YOU THINK
5 THERE ARE OTHERS WHO HAVE MORE INFORMATION ABOUT THE
6 SUPPLY OF GASKETS TO NAPA FROM '59 TO '80 OTHER THAN
7 YOURSELF?

8 MR. PARKER: LACKS FOUNDATION, ASSUMES FACTS.

9 BUT TO THE EXTENT THAT YOU CAN EXPLAIN, GO
10 AHEAD.

11 THE WITNESS: I WAS NOT A SALESPERSON TO NAPA.

12 BY MR. FISHBACK: