Q. HOW LONG DID YOU HOLD THAT POSITION?

A. PROBABLY -- I DID THAT ONE TWICE. SO TOTAL ALTOGETHER ON THAT WAS PROBABLY ABOUT FOUR YEARS.
Q. WHAT DID YOU DO AFTER YOU LEFT THE FIRST TIME?
A. WENT TO SECOND SHIFT SUPERVISOR FOR THE FINISHING DEPARTMENT.
Q. WHAT KIND OF JOB DUTIES DID YOU HAVE WITH THAT?
A. I WAS THE SUPERVISOR OF THE PEOPLE WHO ACTUALLY RAN THE MACHINES IN THE DEPARTMENT TO FINISH THE OIL SEALS IN THAT PARTICULAR AREA AFTER THEY HAD BEEN MOLDED.
Q. WERE YOU RESPONSIBLE FOR WORKER SAFETY?
A. AS A DEPARTMENT MANAGER, UH-HUH.
Q. WERE THESE MACHINES ALL ELECTRIC, THE MANUFACTURING MACHINES; OR DO YOU KNOW HOW THEY WERE POWERED?
A. I DON'T KNOW WHAT THE EXACT POWERING THING WAS. THERE WAS A LOT OF ELECTRICITY. THERE WERE PUMPS IN THE MOLDING AREA.
Q. WERE YOU A MEMBER OF THE UNION WHEN YOU WORKED AT THE OIL SEAL MANUFACTURING PLANT?
A. NO.
Q. WERE THE MANUFACTURING WORKERS A MEMBER OF A UNION?
A. YES.
Q. WHAT UNION WAS THAT?
A. I.A.M., INTERNATIONAL AEROSPACE AND MACHINISTS.

MR. PARKER: YOU TESTIFIED ABOUT THIS IN PRIOR DEPOSITIONS?
THE WITNESS: NOT TO THIS DETAIL.
MR. PARKER: OKAY.
BY MR. FISHBACK:
Q. THE -- WHEN YOU WERE AN INVENTORY RECORDS CLERK, WHEN YOU FIRST STARTED WITH THEM, WERE YOU A MEMBER OF THE UNION?
A. NO.
Q. DO YOU KNOW IF -- IN TERMS OF THE MANUFACTURING POSITIONS, DO YOU KNOW IF VICTOR DANA ONLY EMPLOYS UNION WORKERS?
MR. PARKER: I'M GOING TO OBJECT. THAT IS BEYOND THE SCOPE OF THE STIPULATION WHICH WE'VE NOW ATTACHED AS EXHIBIT 2 TO THIS DEPOSITION. SHE'S NOT THE PERSON MOST KNOWLEDGEABLE ON UNION ISSUES. SO THAT'S JUST -- AND ALSO, YOU'RE TALKING ABOUT IN THE 1980'S, I GUESS, WHICH IS ALSO RIGHT BEYOND -- I'M NOT SURE. I'VE LOST TRACK OF THE TIME PERIOD YOU'RE AT.
MR. FISHBACK: I'M IN THE 1970'S.
MR. PARKER: IN ANY EVENT, THE UNION ISSUES HAVE NOTHING TO DO WITH THIS PARTICULAR DEPOSITION.
MR. FISHBACK: ARE YOU INSTRUCTING HER NOT TO --
MR. PARKER: NO, I'LL LET HER ANSWER. BUT I'M GOING TO WARN YOU, YOU'RE GOING OVER THIS AD NAUSEAM, AND WE'RE GIVING YOU THE REST OF THE DAY, AND YOU'RE USING IT TO GO OVER STUFF LIKE THIS.
IF YOU HAVE HIS QUESTION FRESH IN MIND.
THE WITNESS: ASK ME THE QUESTION AGAIN.
BY MR. FISHBACK:
Q. I JUST WANT TO KNOW IF THE MANUFACTURING POSITIONS AT VICTOR DANA ARE UNION JOBS EXCLUSIVELY?
A. ARE?