

22 UP.
23 BY MR. FISHBACK:
24 Q. DO YOU KNOW ALL OF THE INDIVIDUALS WHO WORKED
25 IN THE SALES DIVISION OF THE PARTS CRAFT DIVISION DURING
0152
1 THE YEARS 1959 AND 1980?
2 A. NO.
3 Q. ALL RIGHT. THE ORGANIZATIONAL STRUCTURE, THE
4 PERSONNEL ORGANIZATION CHART WHICH I WAS REFERRING TO
5 EARLIER, IF IT WAS REQUESTED OF YOU TO PROVIDE A
6 PERSONNEL ORGANIZATIONAL CHART, IF IT WAS CALLED THAT,
7 WOULD THAT BE SUFFICIENT FOR YOU TO UNDERSTAND THAT THE
8 CHART WE'RE LOOKING FOR IS THE CHART WHICH LISTS THE
9 PERSON AND THEIR POSITION AT VICTOR DANA?
10 MR. PARKER: OBJECTION; CALLS FOR HER TO
11 SPECULATE BECAUSE YOU HAVEN'T TOLD HER HOW TO MAKE THE
12 REQUEST. IF YOU'RE ASKING HER TO SPECULATE WHO WOULD BE
13 ABLE TO ANSWER IT. IF YOU WANT SOME SORT OF
14 ORGANIZATIONAL CHART, THE PROPER PROCEDURE IS TO MAKE A
15 FORMAL REQUEST TO COUNSEL AND WE'LL DEAL WITH IT.
16 MR. FISHBACK: THE PROBLEM IS IF I SAY
17 ORGANIZATIONAL CHART, THE IDEA IS THAT YOU MIGHT OBJECT,
18 YOU DON'T KNOW WHAT THAT IS. SO WHAT I'M TRYING TO
19 ASCERTAIN --
20 MR. PARKER: AND YOU'RE TRYING TO ASK IT FROM
21 HER, WHEN SHE MIGHT NOT BE ABLE TO ANSWER IT, AND EVEN
22 THOUGH YOU JUST ADMITTED THAT I WILL HAVE TO OBJECT TO
23 IT.
24 MR. FISHBACK: MY QUESTION IS WHEN I ASK THE
25 QUESTION, "THE PERSONNEL ORGANIZATIONAL CHART TESTIFIED
0153
1 TO AT DEPOSITION BY MS. DUNCAN," THAT'S WHAT I'M
2 REQUESTING, AND YOU WON'T KNOW WHAT I'M TALKING ABOUT.
3 SO YOU CAN ASK HER, AND SHE'LL KNOW WHAT I'M TALKING
4 ABOUT, AND THIS IS THE WAY YOU DO IT.
5 MR. PARKER: MY OBJECTION STANDS.
6 BY MR. FISHBACK:
7 Q. DO YOU HAVE MY QUESTION IN MIND, MA'AM?
8 A. YES.
9 Q. GO AHEAD. YOU CAN ANSWER THE QUESTION.
10 A. EACH DEPARTMENT MANAGER HAS AN ORGANIZATIONAL
11 CHART FOR THEIR DEPARTMENT. I HAVE ONE FOR MY PEOPLE.
12 Q. ALL RIGHT. IS THERE, TO YOUR KNOWLEDGE, AN
13 ORGANIZATIONAL CHART THAT PERTAINS TO ALL OF THE VARIOUS
14 DEPARTMENTS?
15 MR. PARKER: CALLS FOR SPECULATION AS TO "ALL
16 DEPARTMENTS."
17 THE WITNESS: I KNOW MOST OF THE DEPARTMENTS
18 IN THE DIVISION OFFICE HAVE GOT ORGANIZATIONAL CHARTS.
19 WE HAD TO MAKE THEM.
20 MR. FISHBACK: ALL RIGHT.
21 Q. DID YOU MAKE THAT -- BY THE WAY, WAS IT YOUR
22 CHARGE TO DRAW UP THE ORGANIZATIONAL CHART FOR THE
23 DEPARTMENT THAT YOU MANAGE?
24 A. YES.
25 Q. DO YOU REMEMBER THE NAMES OF ANY SALES PEOPLE
0154
1 IN THE PARTS CRAFT DIVISION?
2 MR. PARKER: DIDN'T YOU JUST ASK THAT? THAT
3 WAS ASKED AND ANSWERED. SHE SAID SHE DOESN'T. SHE SAID
4 SHE DOESN'T KNOW THE NAMES OF THE EMPLOYEES.
5 THE WITNESS: YES.
6 BY MR. FISHBACK: