Q. ALL RIGHT. WHAT IS THAT LIST CALLED, CUSTOMER LIST?
A. IT'S NOT REALLY. BUT IT'S A LIST THAT I MADE UP WITH THE FIRST NAME, YOU KNOW, THE BUSINESS NAME OF EACH CUSTOMER AND THE SALES ANALYST AND THE ACCOUNT MANAGER AND THE APPLICATION ENGINEER WHO HANDLED THAT PARTICULAR CUSTOMER NAME.
Q. WHAT IS THAT LIST CALLED?
MR. PARKER: ASSUMES A FACT NOT IN EVIDENCE, IF IT HAS A NAME.
TELL HIM. IF IT DOESN'T, TELL HIM.
BY MR. FISHBACK:
Q. HOW WOULD YOU DESCRIBE THAT LIST?
A. IT'S LIKE A SUPPORT LIST, CUSTOMER SUPPORT LIST.
Q. ALL RIGHT. SO IF I SPECIFICALLY REQUESTED THE CUSTOMER SUPPORT LIST, THEN YOU WOULD KNOW THAT I'M REFERENCING THE LIST THAT YOU'VE JUST DISCUSSED WHEREIN IT LISTS THE CUSTOMER NAME AND THE SALES REPRESENTATIVES

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AND THE ENGINEERING ASSOCIATE, ET CETERA; IS THAT RIGHT?
A. YES.
MR. PARKER: LET ME BE CLEAR THAT IS VERY UNLIKELY SOMETHING TO BE PRODUCED. THAT'S A CURRENT LIST AND, AGAIN, WE'RE TALKING 1950 TO 1980 TIME FRAME. CUSTOMER LISTS ARE PRETTY CONFIDENTIAL.
MR. FISHBACK: WHAT DO YOU THINK, I'M GOING TO STEAL YOUR CUSTOMERS? I DON'T SELL GASKETS.
Q. HAVE YOU EVER SEEN A CUSTOMER SUPPORT LIST FOR YEARS PAST?
A. NO.
Q. HOW -- WHEN YOU FIRST STARTED IN THE SALES DEPARTMENT THERE, HOW DID YOU KNOW WHO YOUR CLIENTS WERE?
MR. PARKER: CUSTOMERS?
BY MR. FISHBACK:
Q. YEAH. CUSTOMERS.
A. EACH ACCOUNT MANAGER HAS A NUMBER. LIKE MY NUMBER IS 30 FOR MY MISCELLANEOUS CUSTOMER ACCOUNTS, AND EACH -- EMBEDDED IN THE CUSTOMER PROFILE IS HIS NAME AND ADDRESS, HIS LOCATION, HIS CORPORATE CREDIT CODE NUMBER IS THE ACCOUNT MANAGER'S NUMBER. SO THAT AS YOU LOOK DOWN, IT SAYS 30, THAT'S MINE.
Q. OKAY. BUT THAT WOULD MEAN THERE'S SOMETHING WHEREIN THE CUSTOMERS ARE TRACKED BY THEIR NAME, CUSTOMER

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NAME; IS THAT RIGHT?
A. WE DO SALES BY CUSTOMER NAME.
Q. SO DOES THAT MEAN THERE'S SOME FILE ON EACH CUSTOMER ORGANIZED BY CUSTOMER NAME?
A. I HAVE SALES REPORTS IN THE COMPUTER THAT I CAN GET FOR ME NOW FOR MY SALES FOR MY CUSTOMERS.
Q. ORGANIZED BY CUSTOMER NAME OR SEARCHABLE BY CUSTOMER NAME?
A. NO. IT'S NOT CUSTOMER NAME. IT'S -- THIS IS GOING TO GET COMPLICATED.
Q. THAT'S UNFORTUNATE.
A. I'LL EXPLAIN IT, BUT IT'S OKAY. THE WAY I HAVE OUR DATABASE SET UP FOR SALES RECORDS -- AND I CREATED THIS, OKAY -- IS EACH CUSTOMER HAS WHAT'S CALLED A SHIP-TO-CUSTOMER TERRITORY ASSIGNED TO IT. AND THAT CODE IS MADE UP OF THE ACCOUNT MANAGER'S CODE NUMBER AND WHETHER THIS PARTICULAR LOCATION IS AN O.E.M. LOCATION,