

21 INDUSTRIAL PRODUCTS OF DANA.
22 Q. OKAY.
23 A. ALONG WITH THE OIL SEALS.
24 Q. SO HOW -- SORRY?
25 A. THAT DIVISION WAS CHARGED FOR THAT SQUARE

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1 FOOTAGE THAT WAS USED FOR THE INVENTORY IN MY OFFICE
2 SPACE.
3 Q. VERY COMPLICATED. HOW LONG DID YOU HOLD THAT
4 POSITION?
5 A. THEY MOVED IT DOWN TO INDIANAPOLIS IN 1984.
6 IT CHANGED THE WAY -- IT WENT TO A DIFFERENT DIVISION
7 CALLED THE POWER AND TRANSMISSION SALES DIVISION,
8 AND I COUPLED THAT UP WITH SEVERAL OTHER MANUFACTURING
9 PRODUCTS OF OTHER DANA DIVISIONS POWER TRANSMISSION
10 PRODUCTS AND SOLD ALL SEVEN DIFFERENT LINES OUT OF THAT
11 WAREHOUSE IN INDIANAPOLIS.
12 Q. WHEN DID YOU START IN THE INDUSTRIAL
13 DISTRIBUTION WAREHOUSE, OIL SEALS, WHAT YEAR?
14 A. 1980.
15 Q. AND YOU LIVED IN INDIANAPOLIS IN 1984?
16 A. YES.
17 Q. AND HOW LONG WERE YOU IN THE INDIANAPOLIS
18 FACILITY?
19 A. I LEFT INDIANAPOLIS IN 1987.
20 Q. AND THE POSITION YOU HELD THERE STILL INVOLVED
21 THE CONSOLIDATION OF ALL OF THESE -- THE OIL SEALS --
22 INDUSTRIAL DISTRIBUTION FOR OIL SEALS AND ALL THE
23 OTHER --
24 A. NO.
25 Q. IT CHANGED AT SOME POINT?

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1 A. YES.
2 Q. WHEN DID YOU CHANGE?
3 A. 1985. I BECAME THE CUSTOMER SERVICE MANAGER
4 FOR THE INDIANAPOLIS MIDWEST PARTS DEPOT FOR THE
5 WAREHOUSE OPERATIONS DIVISION.
6 Q. WHAT DIVISION?
7 A. IT WAS CALLED THE WAREHOUSE OPERATIONS DIVISION.
8 Q. WHAT DID IT DO?
9 A. THAT WAS ONE OF THE DISTRIBUTION CENTERS FOR
10 ALL OF THE AFTERMARKET PARTS, THAT WAS ONE OF THE BIG
11 ONES.
12 Q. INCLUDING GASKETS?
13 A. INCLUDING GASKETS.
14 Q. INCLUDING THE OIL SEALS?
15 A. INCLUDING OIL SEALS.
16 Q. EVERYTHING? NUMEROUS PRODUCTS?
17 A. YES. SAME THING AS WHAT WAS IN CHURUBUSCO.
18 Q. ALL RIGHT. WHAT WERE YOUR SPECIFIC JOB DUTIES?
19 A. I WAS THE CUSTOMER SERVICE MANAGER, AND I HAD A
20 DEPARTMENT OF SIX PEOPLE WHO TALKED TO CUSTOMERS ON THE
21 PHONE, WHO PLACED ORDERS ON THE PHONE FOR PRODUCTS THEY
22 HAD IN THE WAREHOUSE.
23 Q. O.E.M. AND O.E. SERVICE EXCLUSIVELY?
24 A. NO.
25 Q. INCLUDING AFTERMARKET THEN?

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1 A. THERE WAS NO O.E.M. AND O.E. SERVICE.
2 Q. JUST AFTERMARKET?
3 A. AFTERMARKET.
4 Q. THIS WAS IN THE SAME TIME IN THE MID 1980'S?
5 A. NO, 1985.