

OCTOBER, SEPTEMBER, OCTOBER, TIME FRAME FOR THE COMING YEAR AND 10 YEARS OUT.

Q. OTHER THAN THE SALES RECORDS, ARE THERE OTHER RECORDS THAT YOU'RE AWARE OF THAT CONTAIN SALES INFORMATION FOR THE TIME PERIOD 1959 TO 1980?

A. SAY THAT AGAIN, PLEASE.

Q. OTHER THAN THE SALES RECORDS THAT YOU'VE JUST REFERENCED, ARE THERE OTHER TYPES OF RECORDS OR MATERIALS THAT MEMORIALIZE SALES TO O.E.M. DURING THE TIME PERIOD OF 1959 TO 1980 THAT YOU'RE AWARE OF?

A. YES.

Q. WHAT OTHER TYPE OF SALES ARE YOU AWARE OF?

A. MICROFICHE SALES RECORDS.

Q. THOSE ARE AT THE REPOSITORY; CORRECT?

A. YES. THERE IS A SET AT THE REPOSITORY.

Q. DO YOU ALSO HAVE A SET IN YOUR OFFICE?

A. YES, I DO.

Q. AND THOSE GO BACK FOR HOW LONG?

A. WE FOUND 1940'S DATES ON THERE.

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Q. HOW ARE THOSE DOCUMENTS ORGANIZED?

A. BY PART NUMBER, BY GASKET -- VICTOR PART NUMBER.

Q. ARE THEY ORGANIZED BY O.E.M. PART? IN OTHER WORDS, GENERAL MOTORS, FORD, ET CETERA?

A. NO.

Q. SO TO UNDERSTAND THE MICROFICHE, YOU HAVE TO KNOW WHAT THE PART NUMBERS ARE?

A. CORRECT.

Q. AND YOU ALREADY INDICATED THAT THERE WAS A LEDGER THAT CROSS REFERENCES THE PART NUMBERS AS TO WHAT THEY ARE?

A. NO. WHAT I TALKED ABOUT BEFORE WAS CATALOGS. THE CATALOGS WE JUST SPOKE ABOUT FOR APPLICATION, THAT'S GOT THE PART NUMBERS IN IT --

Q. OKAY.

A. -- RELATING TO A SPECIFIC GASKET APPLICATION.

Q. SO IF I WANT TO REVIEW THE MICROFICHE SALES RECORDS, I NEED TO HAVE THE CATALOG FROM THE SPECIFIC YEAR.

LET'S JUST TAKE A YEAR, 1965. OKAY? IF I WANTED TO REVIEW THE MICROFICHE SALES RECORDS FROM 1965 TO LEARN THE AMOUNT OF SALES TO SAY, FOR EXAMPLE, GENERAL MOTORS, I WOULD NEED A COUPLE OF THINGS, INCLUDING THE MICROFICHE SALES RECORDS; CORRECT?

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A. THAT'S THE ONLY THING YOU'D HAVE FOR AN O.E.M.

Q. I SEE. THERE'S NO CATALOGS FOR O.E.M.?

A. CORRECT.

Q. SO IF I WANTED TO -- IF I WAS REVIEWING THE MICROFICHE SALES RECORDS FOR O.E.M., HOW WOULD I KNOW WHAT PARTS OR PRODUCTS WERE BEING SUPPLIED TO THE O.E.M.?

MR. CORCORAN: STEVE CORCORAN, LACKS

FOUNDATION, CALLS FOR SPECULATION, OVERBROAD.

MR. PARKER: CAN YOU JUST READ THE QUESTION BACK?

MR. CORCORAN: VAGUE AND AMBIGUOUS.

MR. PARKER: STEVE, SHE'S JUST GOING TO READ IT BACK.

(THE RECORD WAS READ BY THE REPORTER AS FOLLOWS:

"QUESTION: SO IF I WANTED TO -- IF I WAS REVIEWING THE MICROFICHE SALES RECORDS FOR