Q. ARE THEY O.E.M. AND AFTERMARKET?
A. THESE ARE O.E.M. AND THEN LIKE SERVICE. I SELL TO LIKE -- OTHER SMALL GASKET CUTTERS, OUR MATERIALS, THINGS LIKE THAT. IT'S NOT -- AFTERMARKET, WE SERVICE O.E. AND O.E. SERVICE AND SELL OUR GASKETS TO THE AFTERMARKET DIVISION TO PACKAGE LIKE CHURUBUSCO PACKAGES AND SELL IT TO AFTERMARKET. WE DON'T SELL TO AFTERMARKET DIRECT OUT OF THE VICTOR DIVISION.
Q. YOU DO SELL DIRECT TO O.E.M. THOUGH; RIGHT?

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A. YES.
Q. SO AN O.E.M. CAN GO DIRECTLY AND BYPASS THE CHURUBUSCO DISTRIBUTION FACILITY, FOR EXAMPLE?
A. OH, YES.
Q. OKAY.
A. CHURUBUSCO DOESN'T SELL TO O.E.M.
Q. RIGHT. THEY ONLY DO AFTERMARKET?
A. YES. AND I'M ALSO THE OFFICE MANAGER FOR THE BUILDING IN LISLE.
Q. HOW MUCH OF YOUR TIME IS SPENT INVOLVED IN LITIGATION-RELATED ACTIVITIES TESTIFYING IN DEPOSITION OR TRIAL?
MR. PARKER: THAT'S TESTIFYING IN DEPOSITIONS AND TRIAL, SO HE'S ASKING FOR AN ESTIMATE.
THE WITNESS: PROBABLY LESS THAN 2 PERCENT.
BY MR. FISHBACK:
Q. WHAT IS MOST OF YOUR TIME SPENT DOING?
A. OH, MY.
MR. PARKER: YOU MEAN BEYOND WHAT SHE DESCRIBED AS HER JOB FUNCTIONS?
MR. FISHBACK: IS IT TRAINING? IS IT OFFICE MANAGEMENT?
THE WITNESS: WOW.
BY MR. FISHBACK:
Q. IS IT JUST KIND OF EVERYTHING?

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A. I THINK IT'S JUST KIND OF EVERYTHING. I COULDN'T SAY THAT I'M DOING ONE A WHOLE LOT MORE THAN THE OTHER.
Q. WHO'S YOUR BOSS AT THE LISLE FACILITY?
A. DENNY JONES.
Q. WHAT'S THE POSITION OF MR. JONES?
A. HE'S DIRECTOR OF HEAVY DUTY SMALL AND SPECIAL ENGINE SALES.
Q. YOU'RE NOT CURRENTLY A MEMBER OF A UNION; RIGHT?
A. THAT'S CORRECT.
Q. IS YOUR POSITION CONSIDERED ONE IN MANAGEMENT?
A. YES.
Q. AND HAS IT BEEN EVER SINCE YOU BECAME A SALES OPERATIONS MANAGER?
A. IT'S A LOT FURTHER BACK THAN THAT. IT WOULD HAVE TO BE 1980.
Q. SO WHEN YOU STARTED AT THE INDUSTRIAL DISTRIBUTION WAREHOUSE?
A. UH-HUH.
Q. OKAY. OTHER THAN THE ONE INDIVIDUAL YOU MENTIONED, DENNY, ARE THERE OTHERS WHO ARE ABOVE YOU AT THE LISLE FACILITY?
A. YES.
Q. HOW MANY OTHERS?

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A. THE STAFF, WELL, IT'S NOT -- WE DON'T HAVE A