

12 PEOPLE. IT WAS MADE UP OF THE SALES PEOPLE WHO SOLD THE
13 PRODUCTS OUT OF THE SERVICE PARTS DIVISION.
14 Q. WHERE WAS THE PARTS CRAFT DIVISION LOCATED?
15 A. I THINK -- I DON'T KNOW, I THINK THEY HAD LIKE
16 A CENTRAL OFFICE IN THE TOLEDO AREA, BUT THE ACCOUNT
17 MANAGERS WERE REGIONAL AND HAD OFFICES IN THEIR HOMES AND
18 DIFFERENT PLACES. I DON'T THINK THEY HAD A BUILDING
19 OTHER THAN MAYBE AN OFFICE IN TOLEDO SOMEWHERE.
20 Q. DO YOU KNOW WHO HAS THE MOST INFORMATION ABOUT
21 THE PARTS CRAFT DIVISION AND ITS FUNCTIONS AND ITS STAFF?
22 MR. PARKER: CAN I HAVE THE QUESTION AGAIN?
23 (THE RECORD WAS READ BY THE REPORTER AS
24 FOLLOWS:
25 "QUESTION: DO YOU KNOW WHO HAS THE MOST

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1 INFORMATION ABOUT THE PARTS CRAFT DIVISION AND
2 ITS FUNCTIONS AND ITS STAFF?")
3 MR. PARKER: FOR THE SAME PERIOD, '59 TO '80,
4 IF YOU KNOW.
5 THE WITNESS: I DON'T KNOW WHO'S AROUND
6 ANYMORE. I DON'T KNOW THAT I CAN GIVE YOU A NAME.
7 BY MR. FISHBACK:
8 Q. ARE THERE RECORDS OF PAST EMPLOYEES OF VICTOR
9 DANA?
10 A. OF VICTOR DANA?
11 Q. YES.
12 A. OH, CERTAINLY.
13 Q. WHERE ARE THOSE KEPT?
14 A. SOME OF THEM ARE KEPT -- I WOULD THINK MOST OF
15 THEM ARE KEPT AT CORPORATE WITH THE PENSION GROUP. I
16 DON'T KNOW WHO'S IN CHARGE OF THE PENSION --
17 Q. WHO'S IN CHARGE OF THE PENSION GROUP?
18 A. I DON'T KNOW.
19 Q. YOU'RE NOT SURE?
20 A. I WOULD HAVE TO ASK H.R.
21 Q. WHO'S IN CHARGE OF H.R.?
22 A. JIM THOMPSON.
23 Q. IS HE IN TOLEDO?
24 A. NO. NO. THAT'S THE H.R. HERE.
25 Q. DO YOU KNOW WHO IS IN CHARGE OF H.R. FOR THE

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1 COMPANY DANA CORPORATION?
2 A. NO.
3 Q. DO YOU KNOW IF THERE IS SOME PERSON?
4 A. PROBABLY, BUT I DON'T KNOW WHO IT IS.
5 Q. YOU GET SOME KIND OF HEALTH BENEFITS THROUGH
6 THE DANA CORPORATION?
7 A. YES.
8 Q. AND YOU'RE NOT RECEIVING A PENSION NOW
9 OBVIOUSLY; CORRECT?
10 A. NOT YET.
11 Q. HAVE YOU BEEN IN TOUCH WITH SOMEONE WHO'S
12 RESPONSIBLE FOR PENSIONS?
13 MR. PARKER: COUNSEL, WHAT'S THE RELEVANCE OF
14 HER PERSONALLY, HER PERSONAL SITUATION?
15 MR. FISHBACK: IT GOES TO HER KNOWLEDGE AS TO
16 WHO IS WORKING IN THE PENSION GROUP.
17 MR. PARKER: SHE DOESN'T HAVE TO TELL YOU
18 THAT. YOU MAY ASK HER WHO ELSE HAS ANY INFORMATION AND
19 SHE CAN TELL YOU THAT, BUT ASKING HER ABOUT HER PERSONAL
20 KNOWLEDGE --
21 MR. FISHBACK: MY QUESTION REALLY GOES TO
22 THE --