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1 MR. CELBA: Object to form.
 2 THE WITNESS: I have no knowledge of that.
 3 BY MR. VALLAS:
 4 Q Okay. In other words, let me ask you this, do you
 5 think after spending 35 years with Dana corporation
 6 that if there was another company manufacturing or
 7 distributing gaskets under the name Victor for at
 8 least the years that you've been with the company
 9 here in the U.S. that you would have known about it,
 10 or do you-- Would you have been in a position with
 11 the company to know about that?
 12 MR. CELBA: Object to form.
 13 THE WITNESS: I really wouldn't have
 14 necessarily been in a position to know that.
 15 BY MR. VALLAS:
 16 Q Never heard of another company doing it?
 17 A No, sir.
 18 Q If Mr. Mathias in this case testified that he saw and
 19 worked with Victor gaskets in the Navy at some time
 20 between 1961 and 1965, would you have any reason to
 21 dispute it?
 22 MR. CELBA: I'm going to object to the
 23 form.
 24 THE WITNESS: I guess the only thing I can
 25 say is that we are in the internal combustion engine

1 form.
 2 BY MR. VALLAS:
 3 Q If that's not what you're telling me, just say no,
 4 Mr. Vallas, you misunderstood me.
 5 MR. CELBA: I still object.
 6 MR. VALLAS: He can answer the question. I
 7 appreciate that.
 8 THE WITNESS: Once again, you've asked the
 9 question in a manner that I guess--
 10 BY MR. VALLAS:
 11 Q Okay.
 12 A You're saying anywhere in the Navy, then we're back
 13 to internal combustion engines and diesel engines.
 14 Q Let me withdraw the question and ask this, Mr.
 15 Mathias and a coworker of his testified that they
 16 worked as boiler technicians, when they were working
 17 as boiler technicians in the U.S. Navy, on U.S. Naval
 18 vessels, between 1961 and 1965, that they worked with
 19 Victor gaskets, do you have any reason to dispute
 20 that the Victor gaskets they said they were working
 21 with were anyone else's other than you all's?
 22 MR. CELBA: Object to the form.
 23 THE WITNESS: In the context that it was in
 24 their normal duties of working with boilers, I would
 25 find it very unusual that they would have encountered

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1 and diesel engine business, so if he were taking
 2 apart an engine, that's about all I can, you know, I
 3 can say.
 4 BY MR. VALLAS:
 5 Q Okay. So, well, if he wasn't working on an engine--
 6 I'll give a-- Let's look at my notes, and I'll tell
 7 you what he was doing. He was a boiler technician on
 8 a couple of ships in the Navy between 1961 and 1965,
 9 and both he and a guy he worked with in the Navy said
 10 that they worked with Victor gaskets during that time
 11 period on U.S. Naval vessels as boiler technicians.
 12 You got any reason to dispute that it wasn't you
 13 all's product that they were working with?
 14 MR. CELBA: Object to form.
 15 THE WITNESS: I don't know. Since--
 16 Certainly since I've been with the company I don't
 17 recall ever having applications that I would
 18 anticipate you're speaking of. I guess that would be
 19 what I would say to that.
 20 BY MR. VALLAS:
 21 Q Okay. So I guess from 1968 through the present you
 22 don't have any understanding of any Dana Victor
 23 gaskets being used in naval applications; is that
 24 what you're telling me?
 25 MR. CELBA: I'm going to object to the

1 Victor gaskets.
 2 BY MR. VALLAS:
 3 Q What's the basis for that understanding?
 4 A I can't recall an application that we had made that
 5 was that type of application. Once again, we're in
 6 the engine business.
 7 Q Okay. When you got there in 1968 have you ever gone
 8 back and reviewed all the documents to try to get an
 9 understanding of all the different applications
 10 that-- of all the different applications that Dana
 11 Victor gaskets either were intended to be used for or
 12 could have been used for prior to the time that you
 13 started there?
 14 MR. CELBA: Object to form.
 15 THE WITNESS: I've reviewed a number of
 16 documents in relationship to our applications of
 17 gaskets.
 18 BY MR. VALLAS:
 19 Q Yes, sir.
 20 A And I do not see anything there in my review that
 21 would indicate a boiler type of application.
 22 Q You have reviewed what you consider to be-- You
 23 reviewed documents that preexisted or that predate
 24 the commencement of your employment with Dana Victor?
 25 A I've reviewed some documents. There are literally