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| <p style="text-align: right;">Page 30</p> <p>1 Q. And what was your job duty there?</p> <p>2 A. To sell service parts to the OEM's, the</p> <p>3 original equipment manufacturers.</p> <p>4 Q. And what type of service parts were you</p> <p>5 selling?</p> <p>6 A. Transmission, clutch, universal joint and</p> <p>7 axle.</p> <p>8 Q. Was there another individual that would be</p> <p>9 selling gasket materials?</p> <p>10 A. I'm sure there was. I -- I don't even know</p> <p>11 at that time whether we sold gasket materials.</p> <p>12 Q. So you simply don't have any knowledge of</p> <p>13 when Dana began selling gasket materials?</p> <p>14 A. Correct.</p> <p>15 Q. Nor do you have any knowledge as to when they</p> <p>16 sold gasket materials whether asbestos was</p> <p>17 incorporated as a component of those gaskets?</p> <p>18 A. That's correct.</p> <p>19 Q. Did you, when you were in the service parts</p> <p>20 department, sell any parts to domestic automobile</p> <p>21 manufacturers for passenger cars?</p> <p>22 A. I'm sure some of the parts that we sold to</p> <p>23 the Chrysler, Ford and GM's went into light truck. As</p> <p>24 far as passenger car, I have no idea if any of those</p> <p>25 parts went into passenger cars.</p> | <p style="text-align: right;">Page 32</p> <p>1 manufacturers include any foreign companies? And by</p> <p>2 "foreign companies," I don't necessarily mean that</p> <p>3 they're located outside the United States. They may</p> <p>4 have distributors within the United States.</p> <p>5 A. No, at that time Mack Trucks wasn't a</p> <p>6 foreign-owned company, so -- Mack, Brockway, Diamond</p> <p>7 Rio were the main OEM's. We put on presentations to</p> <p>8 their dealer organizations, but none of those sales</p> <p>9 were to foreign manufacturers that I knew of.</p> <p>10 Q. Was there an individual in your division that</p> <p>11 sold to West Coast?</p> <p>12 A. Yes.</p> <p>13 Q. And in that capacity would he be selling to</p> <p>14 those West Coast entities that you talked about</p> <p>15 earlier: Kenworth, Peterbilt, et cetera?</p> <p>16 A. Yes.</p> <p>17 Q. And who are, to the best of your knowledge,</p> <p>18 the West Coast manufacturers that bought Dana's</p> <p>19 clutches?</p> <p>20 A. The ones I named: The Peterbilt, Kenworth,</p> <p>21 Freightliner.</p> <p>22 Q. How about International Harvester?</p> <p>23 A. International Harvester I consider Midwest,</p> <p>24 and they were located in Fort Wayne at the time. We</p> <p>25 sold to them.</p> |
| <p style="text-align: right;">Page 31</p> <p>1 Q. During the time that you were with the</p> <p>2 service department, did you sell any parts to foreign</p> <p>3 car manufacturers or foreign truck manufacturers?</p> <p>4 A. No, I didn't.</p> <p>5 Q. Was that because of a limitation of your job</p> <p>6 or is it because, to your knowledge, Dana didn't make</p> <p>7 such sales?</p> <p>8 A. In 1967 I don't think we made many sales to</p> <p>9 foreign products -- or foreign car manufacturers or</p> <p>10 truck manufacturers.</p> <p>11 Q. How long were you in that job?</p> <p>12 A. About three, four years.</p> <p>13 Q. By the time you left in late 1960's/early</p> <p>14 1970's, is your statement regarding the foreign</p> <p>15 manufacturers still accurate?</p> <p>16 A. Yes.</p> <p>17 Q. Where did you go after you left the service</p> <p>18 department?</p> <p>19 A. I went with the clutch division as an eastern</p> <p>20 region sales representative -- sales and service</p> <p>21 representative.</p> <p>22 Q. And who were you selling to?</p> <p>23 A. I was selling to the East Coast original</p> <p>24 equipment manufacturers.</p> <p>25 Q. And did those original equipment</p>                                                       | <p style="text-align: right;">Page 33</p> <p>1 Q. GMC? Is that East Coast, West Coast --</p> <p>2 A. GMC we sold some to, but GMC got out of the</p> <p>3 heavy truck business and I can't give you the date.</p> <p>4 So the sales to GM -- GMC was not a major clutch</p> <p>5 customer.</p> <p>6 Q. When did the West Coast sales begin, if you</p> <p>7 know?</p> <p>8 A. Ever since the West Coast started making</p> <p>9 heavy trucks, I think they had Spicer-type clutch in</p> <p>10 them.</p> <p>11 Q. Do you know whether any of those clutches</p> <p>12 were sold to Mercedes-Benz for their trucks?</p> <p>13 A. Mercedes-Benz I don't believe was even making</p> <p>14 vehicles in the United States at that time, and they</p> <p>15 hadn't purchased Freightliner by then either.</p> <p>16 Q. What about Marmon?</p> <p>17 A. We supplied clutches to Marmon at some time.</p> <p>18 I don't consider Marmon a foreign clutch manufacturer,</p> <p>19 but --</p> <p>20 Q. No, I was just wondering if you had sold to</p> <p>21 them.</p> <p>22 A. Yes. Any of the heavy-duty -- any of the</p> <p>23 18-wheeler-type truck builders we probably supplied</p> <p>24 some sort of clutch to.</p> <p>25 Q. Is there any way of determining which trucks</p>                                  |