

11 MR. PARKER: AGAIN, WE'RE TALKING ABOUT THE
12 AFTERMARKET?
13 MR. FISHBACK: I'M ASKING, GENERALLY, WHAT KIND
14 OF SALES RECORDS.
15 THE WITNESS: I HAVE MICROFICHE.
16 BY MR. FISHBACK:
17 Q. DO THOSE INCLUDE AFTERMARKET SALES?
18 A. ONLY UP UNTIL VICTOR MANUFACTURING GASKET WAS
19 ACQUIRED BY DANA. IT WOULD LIST ALL CUSTOMER SALES UP TO
20 THAT POINT FOR THE VICTOR MANUFACTURING AND GASKET
21 COMPANY.
22 Q. BUT THOSE ARE ON THOSE JOB CARDS WE DISCUSSED
23 EARLIER?
24 A. YES.
25 Q. IS THAT RIGHT? SETTING ASIDE THE JOB CARDS --

0213

1 I THINK THAT IS WHAT YOU CALLED THEM?
2 A. NO. SALES CARDS.
3 Q. SALES CARDS. SETTING ASIDE THE SALES CARDS --
4 AND THAT'S THE ONES WITH THE PART NUMBER ON THE
5 RIGHT-HAND SIDE AND THE CARD NUMBER ON THE LEFT AND IT
6 GIVES THAT INFORMATION; CORRECT?
7 A. YES.
8 Q. SETTING ASIDE THOSE SALES CARDS, HAVE YOU EVER
9 SEEN ADDITIONAL SALES RECORDS SUCH AS INVOICES
10 PERTAINING TO AFTERMARKET SALES DURING THE 1960'S?
11 MR. PARKER: THAT WAS ASKED AND ANSWERED
12 TWO MINUTES AGO.
13 THE WITNESS: NO.
14 BY MR. FISHBACK:
15 Q. OKAY. AT THE LISLE OFFICE, ARE THERE SALES
16 DOCUMENTS, OTHER THAN WHAT'S CONTAINED ON THE MICROFICHE,
17 KEPT THERE?
18 A. YES.
19 Q. FOR WHAT YEARS?
20 A. WE KEEP QUOTES AND SOME CUSTOMER CORRESPONDENCE
21 FOR A PERIOD OF YEARS AS DEFINED IN THE DANA DOCUMENT
22 RETENTION GUIDE.
23 Q. SO WHAT YEARS DO YOU KEEP AT LISLE?
24 A. IT'S SIX TO TEN YEARS ON THE INFORMATION.
25 Q. SO IN LISLE, ILLINOIS, YOU HAVE NO INFORMATION,

0214

1 NO SALES DOCUMENTS -- SETTING ASIDE THE MICROFICHE,
2 AGAIN. NO SALES RECORDS, INVOICES, THAT GO -- THAT DATE
3 INTO THE TIME PERIOD 1959 TO 1980; IS THAT CORRECT?
4 MR. PARKER: OKAY. THAT'S EXPANDED THE TIME
5 FRAME, WHICH YOU CAN DO. BEFORE YOU TALKED ABOUT THE
6 '60S, AND NOW YOU'VE GONE INTO THE '70S AND UP UNTIL '80.
7 MR. FISHBACK: THAT'S BECAUSE SHE TESTIFIED
8 THAT THE DOCUMENT RETENTION POLICY WAS SIX TO TEN YEARS.
9 MR. PARKER: JUST SO IT'S CLEAR, THAT'S WHAT
10 WE'RE DOING.
11 BY MR. FISHBACK:
12 Q. DO YOU UNDERSTAND MY QUESTION?
13 A. UH-HUH. THERE'S SOME CUSTOMER CORRESPONDENCE
14 THAT'S OLDER THAN TEN YEARS. NOTHING CATEGORIZED, TYPED
15 AND MAINTAINED.
16 Q. WHY WOULD CUSTOMER CORRESPONDENCE BE KEPT PAST
17 TEN YEARS?
18 MR. PARKER: IF YOU KNOW.
19 THE WITNESS: I GOT ONE FILE CABINET IN MY AREA
20 THAT'S GOT CUSTOMER LETTERS AND CORRESPONDENCE AND SOME
21 OF THEIR TERMS AND CONDITIONS AND THINGS LIKE THAT, AND