

15 GIVE US A PRINT OR IT'S A JOINT DESIGN BETWEEN THEIR
16 ENGINEERS AND OURS.
17 BY MR. FISHBACK:
18 Q. IS IT THE CUSTOMER, OR IS IT VICTOR DANA
19 THAT INDICATES THE SIZE OF THE GASKETS?
20 MR. CORCORAN: STEVE CORCORAN. LACKS
21 FOUNDATION, CALLS FOR SPECULATION, OVERBROAD, VAGUE AND
22 AMBIGUOUS.
23 MR. PARKER: JOIN. THIS CALLS FOR
24 SPECULATION. SHE'S IN SALES. IT SOUNDS LIKE AN
25 ENGINEERING QUESTION.

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1 MR. FISHBACK: I DON'T --
2 THE WITNESS: THAT WOULD BE AN ENGINEERING
3 QUESTION. I'M NOT IN THE DESIGN END.
4 BY MR. FISHBACK:
5 Q. SO IS GENERAL MOTORS ONE OF YOUR CUSTOMERS?
6 MR. CORCORAN: STEVE CORCORAN. VAGUE AND
7 AMBIGUOUS, CALLS FOR SPECULATION.
8 THE WITNESS: NOT MY SPECIFIC CUSTOMER.
9 BY MR. FISHBACK:
10 Q. I MEAN ONE OF YOUR OWN CUSTOMERS.
11 A. I'M ALSO AN ACCOUNT MANAGER WITH ACCOUNTS I'M
12 RESPONSIBLE FOR AS WELL AS --
13 MR. PARKER: THE QUESTION IS IS IT ONE OF YOUR
14 CUSTOMERS?
15 MR. FISHBACK: SHE'S EXPLAINING. LET HER
16 ANSWER THE QUESTION.
17 THE WITNESS: YOU MEAN ME PERSONALLY?
18 BY MR. FISHBACK:
19 Q. YES.
20 A. NO.
21 Q. IS GENERAL MOTORS AN ACCOUNT FOR WHICH YOU HAVE
22 SOME RESPONSIBILITY?
23 A. YES.
24 Q. HOW IS THAT -- WHAT IS YOUR RESPONSIBILITY IN
25 CONNECTION THEREWITH?

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1 A. I'M THE SALES OPERATIONS MANAGER FOR THE
2 DIVISION IN THAT CAPACITY. I'M RESPONSIBLE FOR SOME OF
3 THE POLICIES WITH WHICH WE DO BUSINESS WITH ALL OF OUR
4 GASKET CUSTOMERS.
5 Q. WHAT DO YOU MEAN "POLICIES"?
6 A. TERMS, CONDITIONS, GENERAL BUSINESS PRACTICES.
7 Q. IS IT YOUR UNDERSTANDING THAT THE GASKET
8 PRODUCT THAT DANA -- VICTOR DANA MANUFACTURES AND
9 SUPPLIES TO ITS O.E.M. CUSTOMERS, LIKE GENERAL MOTORS,
10 ARE FOR USE ON GENERAL MOTORS AUTOMOBILES?
11 MR. CORCORAN: STEVE CORCORAN. LACKS
12 FOUNDATION, CALLS FOR SPECULATION, OVERBROAD, VAGUE AND
13 AMBIGUOUS.
14 MR. PARKER: DO YOU STILL HAVE THE QUESTION IN
15 MIND?
16 THE WITNESS: SAY THAT AGAIN, PLEASE.
17 BY MR. FISHBACK:
18 Q. IS IT YOUR UNDERSTANDING THAT THE GASKET
19 PRODUCTS THAT VICTOR DANA MANUFACTURED AND SUPPLIED TO
20 ITS O.E.M. CUSTOMERS LIKE GENERAL MOTORS ARE FOR USE ON
21 GENERAL MOTORS VEHICLES?
22 MR. CORCORAN: STEVE CORCORAN. LACKS
23 FOUNDATION, CALLS FOR SPECULATION, OVERBROAD, ASSUMES
24 FACTS.
25 MR. PARKER: JOIN.