MR. PARKER: OKAY. THAT'S YOUR CHOICE. SO YOU UNDERSTAND THAT SHE'S PREPARED TO MOVE INTO THOSE AREAS. YOU DON'T HAVE TO ASK QUESTIONS ABOUT IT, BUT YOU NOW UNDERSTAND THAT SHE'S AVAILABLE TO DO SO.
MR. FISHBACK: I KNOW THAT YOU'RE NOT UNDER OATH, AND I KNOW YOU'VE BEEN MAKING A STATEMENT FOR SOME PURPOSE THAT I DON'T KNOW BUT --
MR. PARKER: I'M ENCOURAGING YOU TO ASK QUESTIONS ON THE TOPIC THAT YOU SAID YOU WANTED TO ASK HER QUESTIONS ABOUT. AND IF YOU DON'T WANT TO DO SO OR ARE GOING TO PUT OFF DOING IT, THAT'S YOUR CHOICE.
BUT SHE'S READY TO GO. AND HER STATEMENT, FRANKLY, IN ANSWER TO YOUR QUESTIONS RIGHT BEFORE THE BREAK, I THINK THERE WAS SOME CONFUSION.

AND I SUSPECT THAT YOU KNEW WHAT IT WAS. SHE CAN TELL YOU WHAT THE CONFUSION WAS, YOU CAN ASK HER. AND THEN YOU'LL BE ALL SET, AND YOU CAN FIND OUT YOUR INFORMATION TO PROPERLY REPRESENT YOUR CLIENT, WHICH I'M SURE THAT IS WHAT YOU WANT TO DO; RIGHT?
BY MR. FISHBACK:
Q. MA'AM, LET ME DIRECT YOU TO CATEGORY NO. 8. TAKE A MOMENT TO READ THAT. CAN YOU READ OVER THAT SINCE YOU HAVEN'T LOOKED AT THIS BEFORE; RIGHT?
A. RIGHT. DO WANT ME TO READ IT OUT LOUD?
Q. NO. TO YOURSELF IS OKAY.
A. OKAY.
Q. HAVE YOU COMPLETED READING IT?
A. UH-HUH.
Q. WHAT HAVE YOU DONE TO PREPARE YOURSELF TO ANSWER QUESTIONS IN RESPONSE TO CATEGORY NO. 8?
MR. PARKER: I THINK WHEN YOU SAY "QUESTIONS RESPONSIVE," YOU MEAN TO PREPARE TO YIELD INFORMATION RESPONSIVE TO THAT CATEGORY?
MR. FISHBACK: ANSWER QUESTIONS ABOUT CATEGORY NO. 8.
MR. PARKER: OKAY. AND YOU MEAN ESPECIALLY FOR THIS DEPOSITION TODAY, RIGHT, BECAUSE SHE'S EXPLAINED SHE HAS A 35-YEAR CAREER.
MR. FISHBACK: WELL, IF SHE WANTS TO SAY HER

35-YEAR CAREER HAS BEEN SPENT PREPARING FOR CATEGORY NO. 8 -- AND I DON'T THINK SHE WOULD SAY THAT.
MR. PARKER: OKAY.
BY MR. FISHBACK:
Q. DO YOU HAVE MY QUESTION IN MIND, MA'AM?
A. SAY IT AGAIN, PLEASE.
Q. WHAT HAVE YOU DONE TO PREPARE YOURSELF TO ANSWER QUESTIONS PERTAINING TO CATEGORY NO. 8?
A. I'M USING THE INFORMATION THAT I'VE ACQUIRED IN WORKING WITH THE CUSTOMERS AND THE GASKETS FOR ALL THE YEARS THAT I'VE WORKED FOR THE COMPANY.
Q. YOU'VE BEEN WORKING WITH CUSTOMERS AND GASKETS REALLY ONLY SINCE ABOUT 1987; CORRECT? IN OTHER WORDS, REALLY, WHEN YOU BECAME THE CUSTOMER SERVICE MANAGER IN INDIANAPOLIS?
MR. PARKER: I'M SORRY. THE QUESTION THEN IS CUSTOMERS AND GASKETS?
MR. FISHBACK: YES.
Q. YOUR KNOWLEDGE OF CUSTOMERS AND CUSTOMERS PURCHASING GASKETS REALLY STARTS IN THE MID 1980'S, DOESN'T IT?
MR. PARKER: YOU MEAN HER PERSONAL KNOWLEDGE?