

15 I KNOW THAT NAPA WAS ONE OF OUR CUSTOMERS. I WAS NOT
16 PART OF THAT STRUCTURE AT THAT TIME TO KNOW WHO OTHER
17 CUSTOMERS WERE. I WASN'T AT THE DENVER WAREHOUSE UNTIL
18 1987.

19 BY MR. FISHBACK:

20 Q. SO YOU REALLY AREN'T THE PERSON MOST
21 KNOWLEDGEABLE ABOUT THE SUPPLY OF VICTOR -- VICTOR
22 GASKETS TO -- FOR EXAMPLE, CAR QUEST; FOR EXAMPLE, PEP
23 BOYS, AUTO ZONE DURING THE TIME PERIOD '59 TO '80?

24 A. NO, I'M NOT.

25 MR. PARKER: THAT'S NOT QUITE THE CATEGORY

0208

1 FOR THIS THAT WE HAD AGREED UPON, BUT YOU MAY PROCEED.

2 BY MR. FISHBACK:

3 Q. WHO IS KNOWLEDGEABLE IN THAT AREA?

4 MR. PARKER: IF YOU KNOW.

5 THE WITNESS: I DON'T KNOW.

6 BY MR. FISHBACK:

7 Q. YOU ARE KNOWLEDGEABLE POST '86 IN THAT REGARD?

8 A. NO. I CAN ONLY TELL YOU CUSTOMERS THAT I DEALT
9 WITH AT MY WAREHOUSE OUT IN DENVER FOR THE PERIOD OF 1987
10 TO '88 WHICH WOULD BE SOME OF THE AFTERMARKET CUSTOMERS.

11 Q. SO TO BE CLEAR THEN, IT IS NOT YOUR TESTIMONY
12 THAT PARTS, INC., IS A LARGE CUSTOMER OF DANA CORPORATION
13 FOR AFTERMARKET AUTOMOTIVE GASKET SUPPLY?

14 MR. PARKER: NO. THAT MISSTATES HER
15 TESTIMONY. SHE'S LIMITED TO THE '59 TO '80 PERIOD. I
16 DON'T KNOW WHAT YOU'RE READING FROM, BUT YOU'RE
17 MISCHARACTERIZING OR ATTEMPTING TO MISCHARACTERIZE HER
18 TESTIMONY.

19 MR. FISHBACK: I KNOW YOU DON'T KNOW WHAT I'M
20 READING FROM. THAT'S WHY I GET TO ASK THE QUESTIONS,
21 AND YOU DON'T UNDERSTAND THE QUESTION.

22 MR. PARKER: NO. I UNDERSTAND YOUR QUESTIONS,
23 BUT YOU'RE MISCHARACTERIZING HER TESTIMONY, WHICH IS THE
24 OBJECTION.

25 BY MR. FISHBACK:

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1 Q. MY QUESTION, DO YOU HAVE IN MIND?

2 A. ABOUT PARTS INC.?

3 Q. YES.

4 A. BEING ONE OF OUR BIG CUSTOMERS?

5 Q. YES.

6 A. AT THE TIME I WAS INVOLVED IN THAT DIVISION?

7 Q. AT ANY TIME.

8 A. THEY WERE ONE OF OUR BIG AFTERMARKET CUSTOMERS.

9 Q. OKAY.

10 A. FOR A PERIOD OF TIME.

11 Q. WHAT PERIOD OF TIME WAS THAT?

12 A. I KNOW IN THE MID TO LATE '80S.

13 Q. ALL RIGHT. AND WOULD THE SAME BE TRUE OF SEARS?

14 A. I DON'T KNOW ABOUT SEARS.

15 Q. OKAY. WHAT ABOUT AUTO ZONE?

16 A. I'M NOT SURE ABOUT AUTO ZONE, NO.

17 Q. WHAT ABOUT PEP BOYS?

18 A. NO.

19 Q. NO, THEY'RE NOT A LARGE CUSTOMER; OR YOU DON'T
20 HAVE ANY INFORMATION?

21 A. THEY WERE NOT A LARGE CUSTOMER OF OURS.

22 Q. WHAT ABOUT CAR GO? DO YOU KNOW THAT COMPANY?

23 A. YES, THEY WERE A CUSTOMER.

24 Q. HAVE YOU REVIEWED ANY DOCUMENTS OR SPOKEN TO
25 ANYONE ABOUT THE LARGE CUSTOMERS OF DANA CORPORATION FOR