MR. PARKER: WELL, LET ME OBJECT. FOR WHAT PURPOSE? DO YOU MEAN IN HER SALES DEPARTMENT? DOES SHE RECOMMEND?
MR. FISHBACK: SURE.
MR. PARKER: OTHERWISE, IT'S VAGUE AND AMBIGUOUS.
MR. FISHBACK: OKAY. SO IT'S VAGUE AND AMBIGUOUS.
MR. PARKER: OKAY.
THE WITNESS: THERE'S WHAT THEY CALL A TWO-STEP DISTRIBUTION AND THREE-STEP DISTRIBUTION.
BY MR. FISHBACK:
Q. OKAY. WHAT WOULD THAT BE?
A. AN EXAMPLE WOULD BE IF AN AFTERMARKET GROUP SOLD TO A DISTRIBUTION CENTER WHO THEN SELLS TO A SMALL PARTS STORE, FAMILY OWNED PARTS STORE WHO THEN SELLS TO AN END USER, WOULD BE CONSIDERED A THREE-STEP DISTRIBUTION.
Q. WHAT'S THE TWO-STEP DISTRIBUTION?
A. WHERE YOU'RE SELLING TO AN ENTITY THAT'S SELLING TO A REBUILDER WHO ACTUALLY IS APPLYING THE GASKET TO THE VEHICLE. SO THAT WOULD BE TWO-STEP.
Q. CAN YOU GIVE ME AN EXAMPLE OF A TWO-STEP AFTERMARKET SCENARIO COMPANY?
MR. PARKER: WITHIN THE 1959 TO 1980 TIME FRAME?

MR. FISHBACK: YEAH.
THE WITNESS: NO, I COULDN'T. NO.
BY MR. FISHBACK:
Q. HAS SEARS EVER BEEN AN AFTERMARKET CUSTOMER OF DANA CORPORATION, VICTOR?
A. I NEVER SOLD FOR THE AFTERMARKET. SO I'M NOT SURE WHO SOME OF THEIR CUSTOMERS WERE.
Q. OKAY. IN THE TWO-STEP PROCESS IT WOULD GO -- AS I UNDERSTAND THE SCENARIO, IT WOULD LEAVE THE VICTOR DANA DISTRIBUTION POINT AND GO DIRECTLY TO THE COMPANY THAT'S INSTALLING THE PRODUCT ONTO A VEHICLE OR ONTO AN ENGINE; IS THAT RIGHT?
A. NO. THERE'S ONE STEP IN BETWEEN.
Q. I GUESS WHAT I'M TRYING TO UNDERSTAND IS -- I'M NOT SURE. MAYBE YOU COULD EXPLAIN TO ME AGAIN, THEN, THE DIFFERENCE BETWEEN A TWO-STEP AND THREE-STEP PROCESS?
MR. PARKER: JUST --
THE WITNESS: THREE-STEP PROCESS WOULD BE I'M SELLING TO A DISTRIBUTION CENTER OF A PARTS COMPANY. WE'LL USE NAPA. WE CAN USE NAPA. THEY SELL THEN TO A JOBBER STORE.
BY MR. FISHBACK:
Q. OKAY.
A. WHO THEN YOU GO IN AND BUY THE GASKET TO APPLY TO THE VEHICLE.

Q. THAT'S THE THREE-STEP PROCESS?
A. YES.
Q. AND, INCIDENTALLY, YOUR USE OF NAPA, NAPA HAS BEEN AN AFTERMARKET CUSTOMER OF DANA DURING THE TIME PERIOD OF 1959 TO 1980?
MR. DUPLANTY: TODD DUPLANTY ON BEHALF OF GENUINE PARTS COMPANY. OBJECTION; LACKS FOUNDATION, CALLS FOR SPECULATION, MISCHARACTERIZES THE RELATIONSHIP, VAGUE AND AMBIGUOUS.