

14 EXISTENCE AT THE SAME TIME THE NATIONAL ACCOUNTS DIVISION
15 WAS?

16 A. YES.

17 Q. DO YOU REMEMBER ANY OF THE NAMES OF THE SALES
18 STAFF IN THE NATIONAL ACCOUNTS DIVISION?

19 A. I DON'T REMEMBER ANYONE. SPECIFICALLY, I DON'T
20 REMEMBER ANYONE.

21 Q. WOULD YOU GO THROUGH THE SAME PROCESS AS WE
22 DISCUSSED EARLIER WITH RESPECT TO THE PARTS CRAFT
23 DIVISION IF YOU WANTED TO ASCERTAIN NAMES OF PEOPLE WHO
24 WERE IN THE NATIONAL ACCOUNTS DIVISION?

25 MR. PARKER: OBJECTION; VAGUE AND AMBIGUOUS AS
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1 PHRASED, CALLS FOR A NARRATIVE.

2 THE WITNESS: I WOULD GO TO H.R., YES.

3 BY MR. FISHBACK:

4 Q. DID YOU HAVE FREQUENT CONTACT WITH THE NATIONAL
5 ACCOUNTS DIVISION?

6 MR. PARKER: VAGUE AND AMBIGUOUS AS PHRASED TO
7 THE USE OF THE WORD "FREQUENT." AND AGAIN, YOU'RE
8 REFERRING, TO THE PERIOD OF -- 20-YEAR PERIOD -- '59 TO
9 '98, 40 YEAR PERIOD MAYBE?

10 THE WITNESS: I HAD --

11 MR. FISHBACK: YES.

12 THE WITNESS: I HAD ONE OF THE ACCOUNT
13 MANAGERS FOR NATIONAL ACCOUNTS IN THE SAME WORK AREA THAT
14 I WAS IN FOR A PERIOD OF ONE YEAR, 1987 TO '88. SO THAT
15 WAS AS CLOSE AS I GOT. AND I DO REMEMBER HIS NAME NOW.

16 BY MR. FISHBACK:

17 Q. WHAT'S THAT PERSON'S NAME?

18 A. JEFF WOOLEY.

19 Q. WHEN IS -- IS MR. WOOLEY STILL ALIVE?

20 A. I THINK SO.

21 Q. WHEN IS THE LAST TIME YOU SPOKE WITH HIM?

22 A. PROBABLY TEN YEARS AGO.

23 Q. DO YOU KNOW THE CITY IN WHICH HE LAST RESIDED
24 IN?

25 A. IT WAS IN THE DENVER AREA.

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1 Q. DURING THE 1959 TO 1980 TIME PERIOD, WHY WAS IT
2 THAT YOU WOULD HAVE ANY CONTACT WITH THE NATIONAL
3 ACCOUNTS DIVISION?

4 A. WHY WOULD I?

5 Q. YES.

6 A. I WORKED FOR THE SERVICE PARTS DIVISION FROM
7 1968 TO 1970 AND THE PEOPLE WOULD FREQUENTLY COME INTO
8 OUR OFFICE BECAUSE THEY SOLD THE PRODUCTS THAT WE HAD IN
9 THE WAREHOUSE.

10 Q. DOES THE SERVICE PARTS DIVISION STILL EXIST?

11 A. NO.

12 Q. DO YOU --

13 A. NOT BY THAT NAME.

14 Q. I UNDERSTAND. IT'S CHANGED ITS NAME TO
15 SOMETHING ELSE?

16 A. YES.

17 Q. DANA CORPORATION IS STILL DISTRIBUTING
18 MATERIALS?

19 A. YES.

20 Q. WHAT IS THE NAME OF THE DIVISION THAT USED TO
21 BE SERVICE PARTS DIVISION?

22 A. IT'S ABSORBED INTO THE CLEVITE ENGINE PARTS
23 GROUP.

24 Q. "CLEVELAND" ENGINE PARTS GROUP. WHEN DID THAT