

1 what you said in the affidavit, and maybe that'll help
2 you remember, okay?

3 Here it says, "Then Dennis, one of the
4 supervisors" --

5 MR. DUFFY: Just a minute. Counsel,
6 can you tell me where you're looking?

7 MR. RICHEY: I'm looking at the
8 second page.

9 MR. DUFFY: Okay. And -- and where
10 are you on the second --

11 MR. RICHEY: Right -- the --

12 MR. DUFFY: Oh, I gotcha. I gotcha.
13 Okay.

14 CROSS-EXAMINATION (CONT'D)

15 BY MR. RICHEY:

16 Q. Okay. It says, "Then Dennis, one of the
17 supervisors, got on the phone. And when he got off
18 the phone he said to our group" -- well, first of all,
19 do you know who he was talking to on the phone?

20 A. I don't.

21 Q. And you don't know. "And then he said we
22 have a little bit of a situation here." And --

23 A. I do -- I do remember that.

24 Q. Okay. So he didn't say somebody wants to
25 talk to you, he said we have a little bit of a

1 lot from time to time?

2 A. Yes.

3 Q. And do you see individuals who are -- and
4 so I -- that's fine. That's all I need, Your Honor.

5 So Mr. Hunt is talking to you guys and the
6 supervisors are off by themselves; right?

7 A. Yes.

8 Q. Okay. And then after a certain period of
9 time, about how long Mr. Frank came back, how long was
10 that time?

11 A. Five or ten minutes after they were
12 finished talking to us they -- and they -- Teddy and
13 Sharita both left.

14 Then the supervisors came back and we just
15 continued on with our orientation.

16 Q. So Mr. Frank gets a phone call. He says
17 I've got a situation. He and his guys go away. Some
18 Teamsters -- I mean, some UAW folks come up; is that
19 correct?

20 A. Yes. I'm -- at that time I didn't know who
21 he was, though. I've never seen one of those tugs on
22 our lot.

23 Q. But you said subsequently you've seen those
24 kinds of vehicles.

25 A. I've seen them.