

1 Q Did he deal with public relations for the
2 company?

3 A Probably partly.

4 Q In the 1940s?

5 A As far as I know.

6 BY MR. SMITH:

7 Q The fiberglass pipe insulation was the
8 insulation that you were selling, correct?

9 A Right.

10 Q And during that period of time you sold that
11 insulation primarily to people who actually worked for
12 the Asbestos Workers union, correct?

13 A Well, our contractors or distributors,
14 warehouses handled it and delivered it.

15 Q The people who used the product in the
16 field, the fiberglass pipecovering, the people who
17 used that product were primarily people who were
18 members of the Asbestos Workers union, correct?

19 A As far as I know, yes.

20 Q And --

21 A Because they were applying insulation.