

1 1967 time period?

2 THE DEFENDANT: Objection, foundation.

3 Q. Mr. Barlow, Let's start, first of all, with Lockheed shipyard
4 where you worked in 1965. Did you ever observe the Insulag
5 being delivered to the ship?

6 A. Yes, I did.

7 Q. And how did that delivery take place at Lockheed shipyard in
8 1965?

9 A. It would come on a flat bed Pioneer Sand and Gravel truck
10 loaded on pallets, and it would be -- the pallet -- the bags
11 were on pallets. The truck would be unloaded, and then
12 consequently loaded back onto the ship for dispersal in
13 different areas where they were using it.

14 Q. And was this truck a truck that was owned by or did it appear
15 to be owned by the shipyard or an outside entity?

16 THE DEFENDANT: Objection, foundation.

17 Q. You can answer the question.

18 A. I can answer it?

19 Q. Yeah.

20 A. It was -- Pioneer Sand and Gravel owned the truck.

21 Q. And how do you know that, sir?

22 A. There's advertising on it. Big sign on it.

23 Q. And how about in the '66 to '67 period when you were at
24 Todd's shipyard, Mr. Barlow, how did the Insulag, did you
25 ever have the opportunity to observe the Insulag being

1 delivered to the vessels that you worked on at that facility?

2 A. Yes, I did.

3 Q. And how did that delivery take place?

4 A. That delivery was on flat-bed truck.

5 Q. And do you recall the writing on the flat-bed trucks that
6 delivered the Insulag to the ships at Todd's shipyard in the
7 1966 to '67 time period?

8 A. Pioneer Sand and Gravel.

9 Q. I'm handing you what's been marked as Exhibit 13, and I
10 direct your attention to the top half of the page. Can you
11 -- do you recognize anything in that exhibit?

12 A. This truck here, this second truck over is the truck that
13 they brought it in on, the flat bed.

14 Q. That they brought what in, sir?

15 A. They brought the material in.

16 Q. The Insulag?

17 A. The Insulag.

18 Q. Could you show Exhibit 13 to the jury and point to the truck
19 that you recall seeing?

20 A. (Witness is pointing to Exhibit 13).

21 Q. That right there. Okay. Mr. Barlow, how was it that your
22 employment at Lockheed, excuse me, at Todd's shipyard came to
23 an end in 1967?

24 A. Better job.

25 Q. Where did you go?