

1 MR. SHELLENBERGER: Thank you, Your Honor.
 2 Ladies and gentlemen of the jury, Mr.
 3 Ignatowski has just explained to you what happened to
 4 these men. That is the "what" of this case.

5 He also explained to you the "how." The
 6 "how" is how the asbestos caused the disease. He
 7 explained that to you also.

8 My job is to talk to you a little bit about
 9 who the men are, how, another how, how they got
 10 exposed, what defendants are responsible, and most
 11 importantly, which I am sure you are all wondering
 12 right now, why they are responsible, why they are
 13 responsible.

14 As you all heard, Mr. Vandergucht was a
 15 plasterer, and you saw a picture of him. He was a
 16 plasterer, and he started working in this area in
 17 1949.

18 That is a picture of Mr. Vandergucht, and he
 19 worked into the 1970s as a plasterer.

20 Now, when he came over from Belgium after he
 21 finished the Merchant Marines, he had a trade and we

1 all know what a trade is and back in the '50s and
 2 '60s, all of the different men would join different
 3 unions and they would develop a trade and Mr.
 4 Vandergucht's trade was that of a plasterer.

5 Plasterer was very important back then
 6 because, as we all know, they didn't really have
 7 drywall. Therefore, all of the walls going up were
 8 mostly made of plaster.

9 You will hear evidence that Mr. Vandergucht
 10 was a very good plasterer. He was very good at his
 11 trade.

12 In fact, he was so good that he worked for
 13 the same company here in Baltimore for 25 years, John
 14 Hampshire Company.

15 During those 25 years, ladies and gentlemen,
 16 during the '50s and '60s and '70s, there, of course,
 17 was a pretty good amount of building going on and Mr.
 18 Vandergucht, you will hear, was in just about every
 19 building in this city and the surrounding area.

20 He helped build Northern High School. He
 21 helped build GBMC. He helped build Sinai. He helped

1 build Hamilton Junior High School.

2 You will hear countless buildings that Mr.
 3 Vandergucht was in and countless numbers of places
 4 that he helped build.

5 Now, you may ask yourself, how does a
 6 plasterer, a man who is working in buildings, get
 7 exposed to asbestos?

8 Ladies and gentlemen, this is how. This is
 9 nonasbestos-containing pipecovering, but I brought it
 10 in here to demonstrate to you the kind of products
 11 that Mr. Vandergucht was exposed to. This is what
 12 they call a half-round, a half-round.

13 What happened, ladies and gentlemen, is that
 14 they would take these particular pieces of
 15 pipecovering, half-rounds and they would put them on
 16 pipes.

17 Just to give you an example, here is a
 18 photograph of a boiler room, a typical boiler room at
 19 a local building, and you have all of these pipes and
 20 what they want to do is they want to insulate those
 21 pipes.

1 You see a man back here with his tools
 2 hanging and you have all of these pipes, steam lines,
 3 hot water lines, pipes that run from boilers and what
 4 you have to do is you have to insulate those pipes and
 5 the people who did that were asbestos workers. That
 6 was the name of the union. They were called the
 7 Asbestos Workers Union.

8 What they would do is they would take that
 9 half-round and they would place it around the pipes
 10 and they would move up and down the line and, of
 11 course, you would get to the end of a pipe here, not
 12 everything is straight, and what would you have to
 13 do?

14 You would have to cut it. You would have to
 15 cut it and saw it and you would cut that pipecovering,
 16 you would come around that elbow and put something on
 17 called mud and then they would move on down along the
 18 pipe some more.

19 That is basically what the asbestos workers
 20 did. They used pipecovering.

21 They also used another product called