

1 Q But you have no knowledge that there were
2 any pipes there?

3 A What they do, they run a pipe up the wall
4 and then every so far they make an access for it so
5 you can get into it or an entrance that you can get
6 into the pipe.

7 Q But that work had been done before you
8 arrived there?

9 A In the particular area where I was working,
10 yes, the bell towers.

11 Q Do you recall testifying at your deposition
12 that the pipes -- you saw pipes in the boiler room at
13 this site?

14 A I was down in that boiler room, yes.

15 Q But you also testified that you never saw
16 Mr. Vandergucht work in that boiler room, right?

17 A I didn't see him working there, no.

18 Q Okay.

19 A But he could have been in there.

20 Q But you didn't see him?

21 A No, I didn't see him.