

1 MR. MCGOWAN: Line 21, Ms. Sheridan.

2 READING OF DEPOSITION OF ROBERT SILWICK

3 TAKEN ON APRIL 1, 1996

4 (Whereupon, the questions were read by Mr.
5 McGowan, and the answers were read by Ms. Sheridan.)

6 (CONTINUED)

7 BY MR. MCGOWAN:

8 Q And what were you doing on this particular
9 jobsite, sir?

10 A Spraying some beams and portions of a deck,
11 metal decking.

12 Q Now, was this job like the others that you
13 have already described, that you would spray some and
14 then lath some and then spray some?

15 A Yes, sir.

16 Q And is this when you were working with Mr.
17 Vandergucht?

18 A Yes, sir.

19 Q Did you do tampering yourself also with Mr.
20 Vandergucht? Did you tamp yourself, or did you just
21 spray?

1 A No. I did the spray, and Jean did the
2 tamping.

3 Q Now, do you recall seeing Mr. Vandergucht
4 plaster on this job, also?

5 A Yes.

6 Q Other than tamping?

7 A Yes.

8 Q Did you see him use the white coat and the
9 brown coat?

10 A Yes.

11 Q Do you recall who the manufacturer of the
12 white coat was?

13 A USG.

14 Q And the manufacturer of the brown coat?

15 A USG.

16 Q Do you recall the manufacturer of the spray
17 you were using?

18 A Cafco.

19 Q Of the trades that you have listed for us
20 in the prior sites, of those trades that were there at
21 the Normandy Village Mall, are there any other trades

1 other than the sprayers and the plasterers that you
2 believe used asbestos-containing products?

3 A The pipecoverers or insulators, whatever you
4 want to call them.

5 Q Do you know who employed these
6 pipecoverers?

7 A McCormick.

8 Q And do you recall, did these pipecoverers
9 employed by McCormick use the same type of materials
10 that you described for us earlier?

11 A Yes, sir.

12 Q Are there any other materials that you
13 didn't describe for us that you believe they may have
14 used?

15 A I don't remember --

16 Q Did they use anything other than the
17 pipecovering and the wet mud?

18 A I don't recall any.

19 Q Do you recall either the make, trade name,
20 or manufacturers of the products that were used?

21 A Armstrong.

1 Q Now, is that for the pipecovering and
2 cement?

3 A Yes.

4 MR. MCGOWAN: Page 77, line 7.

5 BY MR. MCGOWAN:

6 Q Did you use more than 15 or 20 bags of Cafco
7 at this jobsite?

8 A For the whole job?

9 Q Yes, sir.

10 A Yes.

11 Q Sir, do you know whether the white coat
12 that you used at this jobsite contained asbestos?

13 A What?

14 Q Do you know whether the white coat you used
15 on this jobsite contained asbestos?

16 A Did I know at that particular time that it
17 contained asbestos?

18 Q That is my first question, yes.

19 A No.

20 Q Do you know now if the white coat you used
21 in that jobsite contained asbestos?

1 A I have been informed that that particular
2 product had asbestos in it.

3 Q Who informed you of that?

4 A The employer.

5 Q Someone from Hampshire?

6 A Yes.

7 Q When they informed you that the white coat
8 contained asbestos, did they tell you that the white
9 coat that you were using on this jobsite contained
10 asbestos or just in general that the white coat
11 contained asbestos?

12 A The material itself, no matter what jobsite
13 you used it on.

14 Q Is that what the person told you?

15 A That is what I was informed.

16 Q Do you know how the Armstrong products got
17 up to this jobsite?

18 A You are serious, ain't you?

19 Q I am very serious, sir.

20 A By truck.

21 Q Whose truck?

1 A Armstrong's truck.

2 Q So McCormick employees were using Armstrong
3 products that came in an Armstrong truck, is that what
4 you are telling us?

5 A No.

6 Q What part of the statement is wrong?

7 You told us that the McCormick -- McCormick
8 was the insulation contractor, correct?

9 A No, I didn't say that.

10 Well, I stand corrected because they
11 weren't on the job. It was Armstrong.

12 Q Armstrong was the insulation contractor?

13 A Yes.

14 MR. MCGOWAN: Your Honor, I believe that is
15 it.

16 THE COURT: Okay.

17 MR. MCGOWAN: Thank you.

18 THE COURT: You are welcome.

19 Thank you, Ms. Sheridan.

20 Mr. Williams.

21 MR. WILLIAMS: Yes, Your Honor, Ford now