

1 gypsum lathe, and then they had wood lathes.

2 Q So that is what would be used to actually
3 adhere the brown coat to, the first two or three coats
4 of the plaster that you would put on?

5 A Yes.

6 Q Is it true, sir, that the plaster that you
7 and Mr. Vandergucht would use would be mixed in the
8 middle of the room?

9 A Yes, it would.

10 Q And you would use something called a mortar
11 box to mix that in?

12 A Yes, ma'am.

13 Q And those were pretty big, four feet by
14 seven feet and one foot deep?

15 A Yes.

16 Q The laborers would come in with about 100-
17 pound bag of plaster and dump it in the mortar box?

18 A Yes.

19 Q That process would create a lot of dust?

20 A Yes.

21 Q Mr. Vandergucht would be around when the