

1 Q Sir, am I right that the amount of time you
2 spent around pipecoverers may have been just once or
3 twice a week?

4 A Well, they were on the job like we was.

5 Q But in the same room, maybe once a week?

6 A It varies. You know, it could have been
7 once a week or it could have been -- it was every day
8 you would be around them.

9 Q Do you remember testifying at your
10 deposition, counsel, page 29, that you worked around
11 them about once a week, maybe for an hour?

12 A No, I don't remember that.

13 Q Let me ask you this question, sir, and I
14 will ask you a question. This deposition was taken, I
15 believe, March 4th, 1996.

16 Do you remember that?

17 A Yes, I do.

18 Q Do you remember being asked this question:
19 "Do you have a specific recollection of ever working
20 in the same room as Mr. Vandergucht when pipecovering
21 was being applied?"