

1 Q One. Okay. I know that is a big complex,
2 but you are focusing on one building that you were all
3 there in '67 and '68?

4 A Right.

5 Q Okay. Now, what were you and Mr.
6 Vandergucht doing at this particular job?

7 A Well, he was doing the base coat and I was
8 doing the finish coat.

9 Q Now, I think I forgot to ask you what -- you
10 mentioned that you were all using plaster.

11 What type of plaster would you use at both
12 of these jobs?

13 A Well, it was USG products.

14 Q Okay. Now, at this location at the Social
15 Security building, what type of construction was
16 this?

17 A It was plaster.

18 Q Was this building already in existence or
19 was it a new building?

20 A A new construction.

21 Q Okay. And were there other trades present?