

1 Q Would that also be true of Mr. Vandergucht?

2 A Yes, it was.

3 Q Now, sir, you told us that this was new
4 construction.

5 In addition to your trade, the plasterers,
6 were there other trades at this location?

7 A Well, yes, there was everybody -- all of the
8 trades were there that it would take to build a new
9 building.

10 The plumbers, the plasterers, the
11 bricklayers, the pipecoverers, the electricians, the
12 carpenters.

13 Q If you could, just briefly describe the
14 building.

15 Was this one continuous unit? How many
16 floors? How large was it?

17 A I think at that time it was five floors. Of
18 course, they have added on later on.

19 Q Okay. So it was five floors.

20 And were you all working throughout the
21 building?