

1 A Yes, it would.

2 Q Now, when you were at the Sinai Hospital,
3 the plasterers would work in teams of two?

4 A Yes, ma'am.

5 Q You were paired with your dad at that
6 jobsite, correct?

7 A Yes.

8 Q And is it true that you are not able to
9 recall the name of the gentleman who worked with Mr.
10 Vandergucht at that job?

11 A No, no, I can't.

12 Q Okay. Were there two separate buildings at
13 Sinai Hospital?

14 A At the time there was two. There was a
15 nurses quarters and the main hospital.

16 Q Now, sir, in your -- in one of your
17 depositions you talked about, in order to do plaster
18 work so that -- I guess so it would be done correctly,
19 you would have to wait for it to be about 40 degrees?

20 A You couldn't plaster if it was freezing.

21 Q Last winter wouldn't have been a good time