block. Now, block was made out of the same type of items as pipecovering.

It was flat, came in various thicknesses, and, of course, since it is flat, it was placed on items that were basically flat themselves, like a boiler or a vessel or a duct.

Pipecovering and block were basically made out of the same stuff, and they had asbestos in them, and the pipecoverers would cut the pipecovering at the work sites.

You are going to say to yourself, okay, we have pipecovering, we have got block, now, how does a plasterer get exposed to pipecovering and block at a jobsite?

Well, I want you to close your eyes and think, if you will, a jobsite which is basically steel concrete and the best way I have heard it described and you will hear men take the witness stand and describe it, it was a virtual beehive of activity.

They had all men of all trades to come in and work at the same time. They had steel people,

concrete people, they had electricians, plumbers, laborers and they had asbestos workers, and they had plasterers, and all of these men would go to these jobsites at the same time because we all know time is money, work needs to be done, you get into that job and you get your work done and you move on to the next place. That is what would happen, ladies and gentlemen.

All day long at these jobsites, the ones that you will hear about, these asbestos workers, these plasterers were working arm in arm, shoulder to shoulder, scaffold to scaffold, room to room.

What did these jobsites look like?

Well, they were extremely dusty, extremely dirty, and I guess the best way that I have ever heard it described is when you have 10 or 15 or even four or five asbestos workers covering pipes and they are moving along their scaffold and they are sawing and the laborers are sweeping and people are opening up the boxes, the best way I have ever heard it described and I can't remember which gentleman said it, but he

will say it in this case, he said if you look up in the air, it was like a snowstorm. He said it was like a virtual snowstorm.

You see all of the particles hanging in the air, and those particles contained asbestos. And asbestos was in the air and it was in the air that people breathed and it was in the air that these men breathed at those locations.

You will not hear any evidence that Jean Vandergucht ever touched a piece of that pipecovering. Never hear any evidence that he touched a piece of that pipecovering.

But the asbestos from that pipecovering was in the air that he breathed, and that is a very important aspect of this case.

That brings me to one very important concept. You will hear a lot about visible dust, visible dust.

Your Honor, may I have the vial, please. I believe it is behind you there.

(Whereupon, vial tendered to counsel.)

MR. SHELLENBERGER: Thank you, Your Honor.

Visible dust. Every time you hear the term visible dust, I want you to think about this vial.

You will get a chance to look at that. It is going to be in evidence.

Ladies and gentlemen of the jury, when you first look in that vial, you are going to say to me, Mr. Shellenberger, what is wrong with you, there is nothing in that vial. That is what you are going to say to me.

You know what? There is a white spec in that vial, a white spec. Every time you hear the word visible dust, I want you to think of that vial because you know how much asbestos particles are in there?

Five million asbestos particles. Five million asbestos particles are in that vial in that white spec.

Every time you hear the term visible dust, ladies and gentlemen, I want you to think about that vial.

All right. We know that these men had