work with that product?
A Oh, numerous times.
Q And can you tell us, the ladies and gentlemen of the jury, how would you use that product compared to what you have just described for us here?
A You would use it the same way. It would be affixed to the pipe or piece of equipment, tank or vessel, whatever you were insulating or trying to insulate.
And it would be tied onto that with wire, beat in with a hammer or your nippers.
Q Would that be used in a similar way as you have already described to us generically?
A Yes. It was only one universal way to apply it.
Q Did you ever have occasion to cut Kaylo?
A Oh, my God, yes, yes.
Q Are you able to estimate how many?
A I guess probably around 40 percent of it, maybe even more.
Q Okay.



A Maybe even more.
Q Now, sir, did you ever have occasion to take the Kaylo pipecovering out of -- what did it come in?
A In boxes.
Q Boxes?
A Yes.
Q Did you ever have any occasion to take it out of the boxes?
A Of course. How else would you get it to the pipe?
Q Okay. When you would take it out of the box, what, if anything, would be created?
A A lot of dust. Even handling just the boxes you created a lot of dust.
Q Where would the dust go?
A On the floor, be on your shoes, on you, the next floor, the elevator if you were taking it up, if you were pulling it up.
Q How would your clothes look?
A They looked like you fell in a powder puff, exactly. You used to take your sweat shirts off



outside and take them and beat on the wall, and you leave a silhouette of white on the wall.
Q Sir, are you able to tell me approximately how many boxes of either Kaylo pipecovering or block you looked at, opened or touched over your years?
A I couldn't give you a number. That would be astronomical. It really would.
Q Sir, on those boxes that you saw over those years of Kaylo pipecovering and block, can you tell me what, if any, items of a warning you ever saw on the boxes?
A I never saw any warnings. I never saw any warnings on any of them.
Q Did you work in the trade up until the 1970s, sir?
A Yes. Oh, yes.
Q And did you work with your trade primarily in the Baltimore City and the surrounding counties?
A Yes, mostly in Baltimore, yeah, right near Baltimore.
Q Right near Baltimore?



A Yes.
MR. SHELLENBERGER: Thank you, Mr. Ball. I believe one of the counsel may have a few questions.
MR. McGOWAN: May I, Your Honor?
THE COURT: Mr. McGowan, you may.
MR. McGOWAN: Thank you.
CROSS-EXAMINATION
BY MR. McGOWAN:
Q Good afternoon, Mr. Ball. My name is Tim McGowan. We never met.
A Good afternoon.
Q Mr. Ball, how many times did you cut pipecovering around Mr. Vandergucht?
A I don't know Mr. Vandergucht.
Q You don't know the plaintiff in this lawsuit, Mr. Vandergucht?
A I know the name. I didn't know him is what I am saying.
Q You didn't work around him, did you, that you can remember?
A I don't know.