

State of Ohio, {
County of } SS.
Cuyahoga.

MERCER CIRCUIT COURT, KENTUCKY.

Iroquois Manufacturing Company, Plaintiff,

Vs

Martin Garage & Implement Company, Defendant.

Deposition taken before me, Ben Rosenfeld, a Notary Public, within and for the County of Cuyahoga, in the State of Ohio, to be read in evidence, on behalf of the Plaintiff, in an action pending in the Mercer Circuit Court, in and for Mercer County, in the State of Kentucky, in which the Iroquois Manufacturing Company are the Plaintiffs and the Martin Garage and Implement Company are the Defendants.

W. J. Coughlin, of lawful age, being by me first duly sworn, as hereinafter certified, deposes and says as follows:

Answer to
Interro-
gatory #1.

I am manager of the Collection Department of the Iroquois Manufacturing Company.

#2. Yes. The date of the sale was July 15, 1914.

#3. We represented that our material would waterproof a Roof, if applied in accordance with our specifications.

#4. We have been in business about eight years.

#5. Different methods are followed for covering roofs of different types. I am attaching hereto, marked "Exhibit A", a copy of the Specification folder we issue to govern the proper application of Adamite.

#6. We receive no complaints from our trade on account of unsatisfactory results, when the material is applied to conform with our specifications. If Adamite is put on a roof in too thin a layer, or if the covering is not continuous to protect every portion of the surface, leakage is liable to occur through