DRAFT

STATE OF ILLINOIS) SS.:

CONRAD YOUNGBERG, being duly sworn, deposes and says:

- l. I have been employed for the past sixteen years by the Electric Auto-Lite Company of Woodstock,

 Illinois, and am at present in charge of the Engineering

 Department, Die Cast Division, of that company.
- 2. I began working for the Woodstock Typewriter Company in approximately 1920. For several years prior to 1930 I was Assistant Superintendent of the Woodstock plant at Woodstock, Illinois, and from the latter part of 1929 until late 1933 I was Superintendent of that plant.
- 3. In connection with my duties at the Woodstock
 Typewriter Company, I designed and set into operation the process for soldering type to type-bars, which process was in
 operation in 1929. The type-bars were first coated with copper,
 after which they were assembled into the type-bar segment. The

type were then soldered on to the bars. The excess solder was ground and filed from the bars and type after which the bars and type were plated by dipping them into a nickel solution.

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ends of the bars.

bars from Woodstock N 230,099 and can not state whether the solder of type to the bars was or was not done at our factory because of the magnification and lighting used when the photographs were made. I do say, however, that I have examined bars and type produced at the Woodstock plant and have noticed considerable variation in the amount of solder left on the

and M 392. I do not recall any change in dies for the letter "t" between the time N 228310 and N 233954 were made at the Woodstock plant. As Assistant Superintendent or Superintendent of the plant I would have been advised of any such change. I am of the opinion that we did not make a small letter "t" as shown in M 391 while I worked at the Woodstock plant.

I have examined photographs M 383, M 384, M 387 and M 391 in regard to markings on the keys. They have the appearance of having struck a paper finger which was bent or broken or having struck the heel afficient them the property of the process of

Their appearance does not indicate to me. that it is evidence of a deliberate alteration of the keys.

- 7. In my opinion, it is not possible to change the curvature of the small letter "t" on a type face without the type face bearing marked evidence of mechanical grinding or abrasion.
- 8. At Woodstock we made no chemical analysis of the steel used. We kept a stock-pile of type in the Stock Room from which the type were withdrawn to the Soldering Department for assembly on the bar. To the best of my knowledge this reserve supply of type totalled at least 25,000 pieces of type. Part of these type could have been made from one batch of steel and part from a different batch.
- 9. From my experience with the Woodstock Company and from my knowledge of the normal practice in typewriter repair work, type and type bars are not re-nickeled after a repair man resolders an old type to a bar or replaces a lost type with a new piece of type.

Sworn to before me this day of , 1952.

STATE OF CALIFORNIA) ss.:

OTTO A HOKANSON, being duly sworn, deposes and says:

- 1. I reside at 302 Alpine Street, Pasadena,
 California. In 1909 I entered the employ of the Emerson
 Typewriter Company, which in about 1911 became the Woodstock
 Typewriter Company. I continued with this firm in various
 capacities until 1925, when I was appointed Superintendent
 of the company's plant at Woodstock, Illinois. I remained
 in this position until about the middle of 1929.
- 2. My duties at Woodstock have resulted in my being very familiar with the operations necessary to solder type to type bars and with the general appearance of the finished product of the factory. When type was soldered to a type bar excess solder was removed by either filing or

grinding. The completed bar was then given a thin coat of nickel. There was considerable variation in the amount of solder left on the bars.

- 3. I have examined M 383, 384, M 391 and M 392.

 It is my opinion that the Woodstock Company did not make a small "t" as shown in M 391 while I worked there. I consider it impossible to change the inside curvature of the bottom of the small "t" as shown in M 392 to make it appear as shown in M 384 without the face of the type showing some signs of alteration.
- 4. I believe that the type faces shown in the photographs marked M 383, M 384, M 391, M 376 and M 387 could reflect mere abnormal use of the typewriter.
- 5. In 1929 while I was Plant Superintendent, the type on hand in the Type Department would vary from a month's supply for some characters to only a few days supply of the more commonly used type. We did not conduct any chemical analysis of the steel used in making type. When we were making type one batch of the type could have been made from two different batches of steel.

6. From my knowledge and experience in the manufacture and repair of typewriters, it is not a normal practice to re-nickel a type bar and type after a type has been resoldered to a type bar.

Sworn to before me this day of , 1952.

STATE OF ILLINOIS) ss.:

JOSEPH SCHMITT, being duly sworn, deposes and says:

plant of the Woodstock Typewriter Company since 1920. This plant was transferred to the R. C. Allen Business Machines

Company and I am now employed by that organization. By

virtue of my many years of employment at the Woodstock

plant, I am familiar with the typewriters produced by that

company in 1929, and with the production procedures followed.

2. At Woodstock the type bars were first coated with copper. The type were then soldered on to the type bars. The excess solder was filed from the bars after which the bars and type were plated by dipping them into a nickel solution.

- 3. I have examined a set of photographs of type bars from Woodstock N 230,099. The soldering on these type bars is not abnormal and resembles the work produced at the Woodstock factory in 1929.
- 4. I have examined photographs M 383, M 384, M 391 and M 392. I recall no change in the dies used for the letter "t" in or about the year 1929. I have examined photographs M 383, M 384, M 387 and M 391 in regard to the

marking on the keys. They do not indicate a deliberate alteration of the keys in my opinion.

5. At Woodstock we made no chemical analysis of the steel used. We kept a stock-pile of type at the plant and part of such a stock-pile could be from one batch of steel and part from a different batch.

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Sworn to before me this

STATE OF CALLFORNIA) SS.:

OTTO A. MOKA SON, being duly sworn, deposes and says:

- In 1909 I entered the en loy of the Emerson Typewriter Company, which in about 1911 became the modstock Typewriter Company. I continued with this firm in various capacities until 1925, when I was appointed Superintendent of the company's plant at Woodstock, Illinois. I remained in this position until about the middle of 1929.
- very familiar with the operations necessary to solder type to type bars and with the general appearance of the finished produce of the factory. When type was soldered to a type bar excess solder was removed by either filing or grinding. The completed bar was then given a thin coat of nickel. There was considerable variation in the amount of solder left on the bars.
- 3. I have examined ! 383, M 384, M 391 and M 392. It is my orinion that the woodstock Company did not make a small "t" such as shown in M 391 while I worked there. I consider it impossible to change the inside curvature of the bottom of the small "t" as shown in H 392 to make it appear as shown in M 381 without the face of the type showing some signs of alteration.
- h. I believe that the type faces shown in the photographs marked E 303, N 38h, N 391, N 376 and N 387 could reflect more abnormal use of the type writer.
- hand in the Type Department would vary from a month's supply for some characters to only a few days supply of the more commonly used type. We did not conduct any chemical analysis of the steel used in making type. When we were making type one batch of the type could have been made from two different batches of steel.

6. From my knowledge and experience in the manufactured at repair of typewriters, it is not a normal practice to re-nickel a type bar and type after a type has been resoldered to a type bar.

Sworn to before me this

13 day of May, 1952.

TOTARY PUBLIC

My Commission Expense May 23, 1986

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES)

OTTO A. HOKANSON, being duly sworn, deposes and says:

- 1. I reside at 302 Alpine Street, Pasadena, California. In 1909 I entered the en loy of the Emerson Typewriter Company, which in about 1911 became the Woodstock Typewriter Company. I continued with this firm in various capacities until 1925, when I was appointed Superintendent of the company's plant at Woodstock, Illinois. I remained in this position until about the middle of 1929.
- 2. By duties at moodstock have resulted in my being very familiar with the operations necessary to solder type to type bars and with the general appearance of the finished produce of the factory. When type was soldered to a type bar excess solder was removed by either filing or grinding. The completed bar was then given a thin coat of nickel. There was considerable variation in the amount of solder left on the bars.
- 3. I have examined 1: 383, M 381, M 391 and M 392. It is my opinion that the Woodstock Company did not make a small "t" such as shown in M 391 while I worked there. I consider it impossible to change the inside curvature of the bottom of the small "t" as shown in H 392 to make it oppear as shown in M 381 without the face of the type showing some signs of alteration.
- h. I believe that the type faces shown in the photographs marked K 363, K 38h, M 391, M 376 and M 387 could reflect mere abnormal use of the typewriter.
- hand in the Type Department would vary from a month's supply for some characters to only a few days supply of the more commonly used type. We did not conduct any chemical analysis of the steel used in making type. When we were making type one batch of the type could have been made from two different batches of steel.

6. From my knowledge and experience in the repair of typewriters, it is not a normal practice to re-nickel a type bar and type after a type has been resoldered to a type bar.

Sworn to before me this

13 day of May, 1952.

FOTART PURTEO

My Commission Expires May 23, 1985

STATE OF CANCERSA) SS.

OTTO A. PEAK LOF, being duly sworn, deposes and says:

In 1909 I entered the en Roy of the Emerson Typewriter Company, which in about 1/11 became the condition figuration Company. I continued with this fire in various deposities until 1929, when I was associated Company of the company's plant at woodstock, Illinois. I remained in this position until about the middle of 1929.

very familiar with the operations necessary to solder type to type bers and with the seneral appearance of the finished produce of the factory. When type was soldered to a type ber excess solder was removed by either filing or grinding. The completed ber was then given a thin coat of nideal. There was considerable variation in the amount of solder left on the bers.

is my origin that the modstock Company hid not make a small "t" such as shown in 1 391 thile I worked there. I consider it impossible to obtain the i wife curvature of the souton of the small "t" as shown in 2 392 to make it appear as shown in 2 302 without the face of the two showing some signs of alteration.

A. I believe that the frees show in the photographs marked 1 303, 7 204, 1 901, 1 376 and 1 387 could reflect mere abnormal use of the type riter.

hand in the Type Department would very from a month's supply for some characters to only a few days supply of the more commonly used type. We did not conduct any car ical analysis of the steel used in making type. When we were making type one batch of the type could have been made from two different batches of steel.

repair of type riters, it is not a normal practice to re-nickel a type bar and type after a type has been resoldered to a type ber.

Ho & Hahanaan

Sworn to before me this

13 day of May, 1952.

TOTARY PUBLIC

My Commission yours, Man St., 1989.

STATE OF MALENCIS) ss.

CONRAD YOUNGBERG, being duly sworn, deposes and says:

- l. I have been employed for the past sixteen years by the Electric Auto-Lite Company of Woodstock, Illinois, and am at present in charge of the Engineering Pepartment, Pie Cast Division, of that company.
- 2. I began working for the Woodstock Typewriter Company in approximately 1920. For several years prior to 1930 I was Assistant Superintendent of the Woodstock plant at Woodstock, Illinois, and from the latter part of 1929 until late 1933 I was Superintendent of that plant.
- 3. In connection with my duties at the Woodstock Typewriter Company, I designed and set into operation the process for soldering type to type-bars, which process was in operation in 1929. The type-bars were first coated with copper, after which they were assembled into the type-bar segment. The type were then soldered on to the bars. The excess solder was ground and filed from the bars and type after which the bars and type were plated by dipping them into a nickel solution. I have examined bars and type produced at the Woodstock plant and have noticed considerable variation in the amount of solder left on the ends of the bars.
- i. I have examined photographs M 383, M 384, M 391 and M 392. It is a tracell any change in dies for the letter "t" between the time N 228310 and N23395h were made at the Woodstock plant. As traintant Superintendent of Superintendent of the plant I would be been advised of any such change. I am of the opinion that we have a small letter "t" as shown in M 391 while I worked at the Woodstock plant.
- 5. I have examined photographs M 383, M 384, M 387 and M 391 in regard to markings on the type. They have the appearance of having struck a paper finger which was bent or broken or having stuck the heel of another type in motion. Their appearance are indicate to me a deliberate alteration to the type.
- 6. In my opinion, to change the curvature of the small on the type face would be extremely difficult without the ring market evidence of alteration by mechanical means.
- 7. At woodstock we made no chemical analysis of the steel are. We kept a stock-pile of type in the Stock Room from which the type withdrawn to the Soldering Department for assembly on the bar. To be set of my knowledge this reserve supply totalled at least 25,000 pieces of type. Part of these type could have been made from one batch of and part from a different batch.
- 8. rom my experience with the Woodstock Company and from my manufaction in typewriter repair work, type and type bars are not re-mickeled after a repair man resolders an old type to a cer or replaces a lost type with a new piece of type.

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CONRAD YOUNGBERG, being duly sworn; deposes and says; 1. I have been employed for the past sixteen years by the Electric Auto-Lite Company of Woodstock, Illinois, and am at present in charge of the Engineering Department, Die Cast Division, that company. 2. I began working for the Woodstock Typewriter. Companykin approximately 1920. For several years prior to 1930 Lyas Assistant Superintendent of the Woodstock plant at Woodstock, Hillingis; and from the latter part of 1929 untillate 1933 I was Superintendent of that plant. 3. In connection with my duties at the Woodstock Typewriter Company, I designed and set into operation the process for soldering type to type-bars, which process was in operation in 1929. The type-bars were first coated with copper, after which they were assembled into the type-bar segment. The type were then

relieved on to the bars. The excess solder was ground and filed from the bars and type after which the bars and type were plated by dipping them into a nickel solution. I have examined bars and type produced at the Woodstock plant and have noticed considerable variation in the amount of solder left on the ends of the bars.

4. I have examined photographs M 383, M 384, M 391 and M 392. I do not recell any change in dies for the letter "t" between the time N 228310 and N233954 were made at the Woodstock plant. As theistant Superintendent or Superintendent of the plant I would have been advised of any such change. I am of the opinion adid and make a small letter "t" as shown in M 391 while I Woodstock plant.

- 5. I have examined photographs M 383, M 384, M 387 371 in regard to markings on the type. They have the appear of having struck a paper finger which was bent or broken or wing stuck the heel of another type in motion. Their appearance does not indicate to me a deliberate alteration to the type.
- 6. In my opinion, to change the curvature of the small on the type face would be extremely difficult without the earing marked evidence of alteration by mechanical means.
- 7. At Woodstock we made no chemical analysis of the kept a stock-pile of type in the Stock Room from which withdrawn to the Soldering Department for assembly on the To the most of my knowledge this reserve supply totalled at least 25,000 pieces of type. Parts of these type could have been made from me batch of ... and part from a different batch.

8. From my experience with the Woodstock Company and from wowledge of the normal practice in typewriter repair work, type and bars are not re-nickeled after a repair man resolders an old type Macon a lost type with a new piece of type.

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No to the Public Kisseloff-25163

CONRAD YOUNGBERG, being duly sworn; deposes and says: 1. I have been employed for the past sixteen years by the Electric Auto-Lite Company of Woodstock, Illinois, and am at present in charge of the Engineering Department, Die Cast Division, of that company. 2. I began working for the Woodstock Typewriter. Company in approximately 1920. For several years prior to 1930 I was Assistant Superintendent of the Woodstock plant at Woodstock Illinois, and from the latter part of 1929 until late 1933 I was Superintendent of that plant. 3. In connection with my duties at the Woodstock Typewriter Company, I designed and set into operation the procase for soldering type to type-bars, which process was in operation in 1929. The type-bars were first coated with copper, after which her were assembled into the type-bar segment. The type were then coldered on to the bars. The excess solder was ground and filed row the bars and type after which the bars and type were plated by dipping them into a nickel solution. I have examined bars and type produced at the Woodstock plant and have noticed considerable variation in the amount of solder left on the ends of the bars. 4. I have examined photographs M 383, M 384, M 391 and M 392. I do not recall any change in dies for the letter "t" between the time N 228310 and N233954 were made at the Woodstock plant. As assistant Superintendent or Superintendent of the plant would have been advised of any such change. I am of the opinion and the make a small letter "t" as shown in M 391 while I ** Woodstock plant. 5. I have examined photographs M 383; M 384, M 387 In regard to markings on the type. They have the appear of having struck a paper finger which was bent or broken or wing stuck the heel of another type in motion. Their appearance does not indicate to me a deliberate alteration to the type. 6. In my opinion, to change the curvature of the small on the type face would be extremely difficult without the earing marked evidence of alteration by mechanical means. At Woodstock we made no chemical analysis of the kept a stock-pile of type in the Stock Room from which the soldering Department for assembly on the To the most of my knowledge this reserve supply totalled at least 25,000 ploces of type. Part of these type could have been made from me batch of and part from a different batch. 8. From my experience with the Woodstock Company and from moviledge of the normal practice in typewriter repair work, type and ? bars are not me-nickeled after a repair man resolders an old type makes a lost type with a new piece of type. west Chungte Notary Public
Kisseloff-25164

STATE OF ILLINOIS) ss.

JOSEPH SCHLITT, being duly sworn, deposes and says:

- l. I have been employed in the Woodstock, Illinois, plant of the woodstock Typewriter Company since 1920. This plant was later sold to the R. C. Allen Business Machines Company and I am now employed by that organization. By virtue of my many years of employment at the Woodstock plant, I am familiar with the typewriters produced by that company in 1929, and with the production procedures followed.
- 2. At Woodstock the type bars were first coated with copper. The type were then soldered on to the type bars. The excess solder was filed from the bars after which the bars and type were plated by disping them into a nickel solution.
- 3. I have examined a set of photographs of type bars from Woodstock N 230,099. The soldering on these type bars is not abnormal and resembles the work produced at the Woodstock factory in 1929.
- 4. I have examined photographs M 383, M 384, M 391 and N 392. I recell no change in the dies used for the letter "t" in or about the year 1929. I have examined photographs M 383, M 384, M 387 and M 391 in regard to the marking on the keys. They do not indicate a deliberate alteration of the keys in my opinion.
- 5. At Woodstock we made no chemical analysis of the steel used. We and a stock-pile of type at the plant and part of such a stock-pile could be from one batch of steel and part from a different batch.

Sworn to before at onla

day of may 1952

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STATE OF ILLINOIS) SE

JOSEPH SCHLITT, being duly sworn, deposes and says:

l. I have been employed in the Woodstock, Illinois, plant of the moodstock Typewriter Company since 1920. This plant was later sold to the R. C. Allen Business Machines Company and I am now employed by that organization. By virtue of my many years of employment at the Woodstock plant, I am familiar with the typewriters produced by that company in 1929, and with the production procedures followed.

2. At Woodstock the type bars were first coated with copper. The type were then soldered on to the type bars. The excess solder was filed from the bars after which the bars and type were plated by disping them into a nickel solution.

3. I have examined a set of photographs of type hars from Woodstock N 230,099. The soldering on these type bars is not abnormal and resembles the work produced at the Woodstock factory in 1929.

4. I have examined photographs M 383, M 384, M 391 and M 392. I recell no change in the dies used for the letter "t".

in or about the year 1929. I have examined photographs M 383, M 384, M 387 and M 391 in regard to the marking on the keys. They do not indicate a deliberate alteration of the keys in my opinion.

5. At woodstock we made no chemical analysis of the steel used. We knot a stock-pile of type at the plant and part of such a stock-pile could be from one batch of steel and part from a different batch.

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7 day of may 1952

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STATE OF ILLINOIS

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JOSEPH SCHLTTT, being duly sworn, deposes and says:

- 1. I have been employed in the Woodstock, Illinois, plant of the moodstock Typewriter Company since 1920. This plant was later sold to the R. C. Allen Business Machines Company and I am now employed by that organization. By virtue of my meny years of employment at the Woodstock plant, I am familiar with the typewriters produced by that company in 1929, and with the production procedures followed.
- 2. At Woodstock the type bars were first coated with copper. The type were then soldered on to the type bars. The excess solder was filed from the bars after which the bars and type were plated by disping them into a nickel solution.
- 3. I have examined a set of photographs of type hars from Woodstock N 230,099. The soldering on these type bars to not abnormal and resembles the work produced at the Woodstock factory in 1929.
- 4. I have examined photographs M 383, M 384, M 391 and M 392. I recell no change in the dies used for the letter "t". in or about the year 1929. I have examined photographs M 383, M 384, M 387 and M 391 in regard to the marking on the keys. They do not indicate a deliberate alteration of the keys in my opinion.

steel used. We work a stock-pile of type at the plant and part of such a stock-pile could be from one batch of steel and part from a different batch.

Sworn to before a tale

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