

DRAFT

STATE OF ILLINOIS)
COUNTY OF McHENRY) ss.:

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 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. ✓

mut? }
4. I have examined a set of photographs of type 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 ends of the bars.

5. 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 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.

6. 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 of another type in motion.

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)
COUNTY OF *LOG ANGELES*) 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" ^(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 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)
COUNTY OF McHENRY) ss.:

JOSEPH SCHMITT, being duly sworn, deposes and says:

1. I have been employed in the Woodstock, Illinois, plant of the Woodstock Typewriter Company since 1920. This plant was ~~transferred~~ ^{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.

*Woodstock Typewriter Company
R. C. Allen Business Machines
Woodstock, Illinois*

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.

Sworn to before me this

_____ day of _____

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss.:

OTTO A. WOKANSON, 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 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 M 383, M 384, 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 M 392 to make it appear as shown in M 381 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 ~~repair of typewriters~~ 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.

Otto A. Wokanson

Sworn to before me this

13 day of May, 1952.

Joanne L. Elman
NOTARY PUBLIC
and for the County of Los Angeles, State of California
My Commission Expires May 21, 1955

Kisseloff-25159

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) 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 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 M 383, M 384, 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 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 ~~repair~~ 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.

Otto A. Hokanson

Sworn to before me this
13 day of May, 1952.

Joanne L. Quinn
NOTARY PUBLIC
for and for the County of Los Angeles, State of California
My Commission Expires May 21, 1955

Kisseloff-25160

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss.:

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

1. I reside at 502 Alhambra 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 1929, 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 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 E 383, M 384, M 391 and E 392. It is my opinion that the Woodstock Company did not make a small "t" such as shown in E 391 while I worked there. I consider it impossible to change the inside curvature of the bottom of the small "t," as shown in E 392 to make it appear as shown in E 391 without the face of the type showing some signs of alteration.

4. I believe that the type faces shown in the photographs marked E 383, M 384, M 391, M 396 and E 397 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 ~~repair of typewriters~~ ^{CAH} 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.

Otto A. Wormson

Sworn to before me this

13 day of May, 1952.

Joanne L. Quinn
NOTARY PUBLIC
My Commission Expires May 21, 1954

Kisseloff-25161

STATE OF ILLINOIS)
COUNTY OF McHENRY) ss.:

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 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.

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 M 228310 and M 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 use 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 struck 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 letter "t" on the type face would be extremely difficult without the type showing marked evidence of alteration by mechanical means.

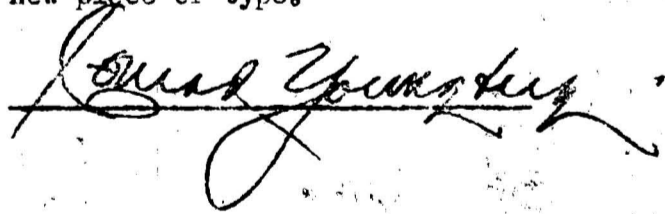
7. At Woodstock we made no chemical analysis of the steel used. We kept a stock-pile of type in the Stock Room from which the type were withdrawn to the Soldering Department for assembly on the bar. To the best of my knowledge this reserve supply totalled at least 25,000 pieces of type. Part of these type could have been made from one batch of steel and part from a different batch.

8. 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-nickled 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

10th day of May, 1952.


Notary Public



Kisseloff-25162

STATE OF ILLINOIS)
COUNTY OF MCHENRY) ss.:

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 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.

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 I would have been advised of any such change. I am of the opinion that no one did make 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 struck 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 letter "t" on the type face would be extremely difficult without the type face bearing marked evidence of alteration by mechanical means.

7. 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 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.

8. 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-nickled 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

9th day of May, 1952.

Notary Public

Kisseloff-25163

STATE OF ILLINOIS)
COUNTY OF McHENRY) ss.:

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 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.

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 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.

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 struck 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 letter "t" on the type face would be extremely difficult without the type face bearing marked evidence of alteration by mechanical means.

7. 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 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.

8. 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-nickled 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

9th day of May, 1952.

Notary Public

Kisseloff-25164

STATE OF ILLINOIS)
COUNTY OF MCHENRY) ss.:

JOSEPH SCHMITT, being duly sworn, deposes and says:

1. 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 type-writers 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 had 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 me this

9 day of May 1952

J. S. ...
Notary Public

Joseph Schmitt

STATE OF ILLINOIS)
COUNTY OF MCHENRY) ss.:

JOSEPH SCHMITT, being duly sworn, deposes and says:

1. 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 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.

Sworn to before me this

9 day of May 1952

Joseph Schmitt

J. J. ...
Notary Public

STATE OF ILLINOIS)
COUNTY OF McHENRY) ss.:

JOSEPH SCHLITT, being duly sworn, deposes and says:

1. 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 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.

Sworn to before me this

9 day of May 1952

Mrs. E. J. Zorella
Notary Public

Joseph Schlitt

74-1333-5346

Kisseloff-25168