

580      *Affidavit of Myles J. Lane in Opposition to Motion.*

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touches upon collateral testimony of a defense witness, and nothing more.

581      14. Norman notes that his analyses of nineteen types on N230,099 reflect ingredients not on other types in the same machine. The Woodstock employees state that it was entirely possible that the type stockpile at the plant would contain types made from different batches of steel. No attempt was made to have all the type on one machine from one precise steel formula. By the same token, a base from one period could well have type produced at an earlier date. As for the varying degrees of solder on the type pointed out by Norman, Schmitt, who looked at the few photographs of N230,099 given us on this motion, says this was a usual plant job (Ex. E). Both Hokanson and Youngberg (Exs. C, D) state that the soldering of type at the plant left many type bars with greatly varying quantities of solder. The "abnormal tool marks" on three letters of N230,099 from which Norman concludes that there was a deliberate alteration of the type are recognized by the Woodstock men as mere evidences of rough wear. They all differ with Norman's statement that the Woodstock Company changed its "t" die in 1929. Norman reaches this conclusion from the fact that a machine he is using as a standard, has a "t" of a different design from the "t" on N230,099. From the statements of the Woodstock executives it would appear that Norman's machine

582      has been altered as to its letter "t". This is another basis for attack upon the Norman affidavit. We have no assurance that his standards are reliable. In any event, his conclusions are unsound and do not support the defendant's application.