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1 Q. Did anybody?

2 A. So over the course of the inspection, the

3 inspectors arrive on the vessel, and we have a

4 pre-inspection meeting with the inspectors and the

5 different department heads. At that point, we divide

6 up personnel with the inspectors, so I had two Coast

7 Guard inspectors with me that were going over the

8 certificates. They looked at the bridge. They looked

9 at the galley. They looked at the living quarters.

10 There were inspectors that we sent out to look at the

11 engineering spaces. We sent out with RMS, and there

12 was an inspector we sent out with the chief mate and

13 the barge engineer and the third mate to perform the

14 inspection of the life-saving equipment.

15 Q. Who went to the davit -- davit?

16 A. The davit inspection was performed with the

17 chief mate, Michael Tyler Gavis. The barge engineer,

18 Josh Lusinger. I don't recall which third mates --

19 Max Paul may or may not have been on board by that

20 point, the new permanent third mate. I don't really

21 remember if he was there or not. It kind of depends

22 on what schedule he would have been on and what Steve

23 Holland's schedule, but it's possible that both of

24 them were, too, and then they would have had a few

25 roustabouts with them, too, to handle the lines, and

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1 generally whenever you run a lifeboat or an FRC, you

2 have a mechanic or electrician with you, too.

3 Q. But you don't know whether or not the Coast

4 Guard was informed that there was a davit problem two

5 or three days before?

6 A. I don't know.

7 Q. Do you know of any reason why the information

8 like that would be withheld from the Coast Guard?

9 MS. HALEVY: Objection; form.

10 A. Any reason why it would be withheld?

11 Q. (BY MR. ROSENBERG) Well, you're having a

12 Coast Guard inspection. You knew three days before we

13 had this issue with the davit and the -- and the fast

14 rescue craft, and, also, it didn't start?

15 A. The not starting is fairly common. I mean,

16 we've all got car batteries, right. Sometimes they

17 run out, and they run out at different times, too. So

18 they are not starting, yes, it's something we keep

19 working on, too, but just because something starts

20 today is no guarantee it's going to start tomorrow.

21 But yes, we were aware that on the 7th that we did

22 the --

23 Q. Right.

24 A. -- FRC, that we had had difficulty starting

25 it there, and that the davit arm was not working

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1 correctly.

2 Q. And is that something that, in your opinion,

3 recognizing you weren't there, would the davit

4 inspectors or the fast rescue inspectors, would that

5 be something in your opinion should have been brought

6 up to the Coast Guard before the Coast Guard caught

7 it?

8 A. It could have been. There's no way they

9 would have not seen it when it was operated. You

10 know, someone pressing the hoist button as it was

11 raising it, so it's not something that they would have

12 failed to notice at the course of their inspection.

13 So there's no reason why it shouldn't have been

14 brought up, but because we were able to launch it, I'm

15 not sure that it was something we really needed to

16 broach with them when they arrived on board.

17 Q. Well, you have a -- an issue, a malfunction

18 with a piece of equipment that's designed to do --

19 designed to save lives, right?

20 A. Yes.

21 Q. So it can't be any more important piece of

22 equipment on the vessel, the fast rescue craft,

23 correct?

24 MS. HALEVY: Objection; form.

25 A. But the purpose of the fast rescue craft is

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1 to rescue a man overboard personnel. At no time did

2 we feel that we were unable to rescue any personnel

3 that went over the side. If we needed to launch that

4 boat, it was launchable.

5 Q. (BY MR. ROSENBERG) Not if it can't start.

6 A. And it started there in the inspection.

7 Q. But sitting here today, it -- it wasn't

8 reported to you whether or not the issues you'd been

9 having with the FRC were communicated to the Coast

10 Guard prior to the Coast Guard catching it?

11 A. I do not know if the issues with the FRC were

12 told to the Coast Guard prior to the inspection.

13 Q. Go to the certificate of compliance and just

14 explain to us what that is.

15 A. The certificate of compliance is a document

16 issued by the Coast Guard. According to the MODU

17 code, Mobile Offshore Drilling Units, the rig is

18 subject to annual inspections/audits/exams by the

19 Coast Guard, and this is a document saying that the

20 rig is safe to operate, in essence.

21 Q. Go to the very bottom where it says, "This is

22 to certify," and there's some dates issued and dates

23 of expiration. It says, 06 February, 2014, but on the

24 right --

25 A. 2015.