

<p style="text-align: right;">61</p> <p>1 Q. I can do more if you want.</p> <p>2 A. That's all right.</p> <p>3 Q. I'm sorry?</p> <p>4 A. That's all right.</p> <p>5 Q. All right. I'm just -- you know, Mr. Jedlicka,</p> <p>6 I want to be perfectly honest. This is my job.</p> <p>7 There's nothing personal here.</p> <p>8 A. No. I understand. I understand.</p> <p>9 Q. I'm going to show Ms. Halevy this document.</p> <p>10 It's Noble 329. We'll probably have to mark it here.</p> <p>11 It was supposed to be 9 in Hawkins' deposition. We did</p> <p>12 use 9. All right. So we're now looking at a document</p> <p>13 that was marked in Mr. Hawkins' deposition. We're not</p> <p>14 going to re-mark it here. But it's Bates-stamped Noble</p> <p>15 329. You see that at the bottom -- bottom right,</p> <p>16 correct?</p> <p>17 A. Yes, sir.</p> <p>18 Q. All right. Take a few seconds and look that</p> <p>19 over.</p> <p>20 Have you had a chance to review that?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Without going word for word tell us what it is,</p> <p>23 this -- this string here.</p> <p>24 A. So Captain Hagopian had sent in this -- sent me</p> <p>25 this e-mail talking about what we had discussed prior</p>	<p style="text-align: right;">63</p> <p>1 characterize a davit?</p> <p>2 A. A davit is what you use to launch the FRC into</p> <p>3 the water.</p> <p>4 Q. Okay. There was a phone conversation</p> <p>5 referenced in this because he's following up the phone</p> <p>6 conversation with these e-mails, correct?</p> <p>7 A. Yes, sir.</p> <p>8 Q. Do you remember the phone conversations?</p> <p>9 A. Yes. We -- we had a phone conversation, yes,</p> <p>10 sir.</p> <p>11 Q. Okay. What -- explain to me from your -- from</p> <p>12 your recollection of the -- of the report what was the</p> <p>13 issue with the -- with the lifeboats, the four</p> <p>14 lifeboats?</p> <p>15 A. They were lowered but not launched.</p> <p>16 Q. Okay. And for someone who might not be</p> <p>17 familiar with the process, explain why that's wrong or</p> <p>18 what the -- what the issue is with that.</p> <p>19 A. We have -- we have a requirement every 90 days</p> <p>20 to lower and launch our lifeboats.</p> <p>21 Q. Okay.</p> <p>22 A. And that's what that's pertaining to.</p> <p>23 Q. It didn't happen that way, correct?</p> <p>24 A. No, sir.</p> <p>25 Q. Okay. What did your investigation reveal with</p>
<p style="text-align: right;">62</p> <p>1 to this e-mail. I sent him out an e-mail saying, "Yes,</p> <p>2 I received your e-mail. We'll look in the matter,</p> <p>3 correspond with you accordingly. If you have any</p> <p>4 questions or comments, call me." And then he sent back</p> <p>5 on the 23rd a note to follow up and see where things</p> <p>6 stand.</p> <p>7 Q. Do you remember responding to that?</p> <p>8 A. No, sir, I didn't.</p> <p>9 Q. Okay. Why not?</p> <p>10 A. Because I was still investigating.</p> <p>11 Q. Okay. First of all, your -- your March 20th,</p> <p>12 2015, 7:31 a.m. correspondence specifically states that</p> <p>13 you received the underlying e-mail as the ADPA, as the</p> <p>14 associate designated person ashore, correct?</p> <p>15 A. Yes, sir.</p> <p>16 Q. So it looks to me as if Captain Hagopian is</p> <p>17 following procedures, one, with regard to reporting a</p> <p>18 lifeboat situation, whether or not they were launched</p> <p>19 and maneuvered, and another one regarding the issue</p> <p>20 with the FRC davit, correct?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Okay. Now, there's some abbreviations in</p> <p>23 there. FRC is fast rescue craft, right?</p> <p>24 A. Yes, sir.</p> <p>25 Q. And a davit is a controlling -- how do you</p>	<p style="text-align: right;">64</p> <p>1 regard to whether or not the lifeboats were lowered and</p> <p>2 actually launched?</p> <p>3 A. They weren't.</p> <p>4 Q. Okay. Why is it important from a safety</p> <p>5 perspective to ensure that lifeboats are launched and</p> <p>6 the whole procedure is complied with?</p> <p>7 A. So they operate when we need them.</p> <p>8 Q. Okay. It is a dry run to make sure people</p> <p>9 don't die, right?</p> <p>10 A. Right.</p> <p>11 Q. Okay. Then we have the issue regarding the FRC</p> <p>12 davit. What was your understanding as to what -- what</p> <p>13 was transpiring with the davit issue?</p> <p>14 A. The davit issue was -- was one of the things</p> <p>15 that was written up during the Coast Guard inspection</p> <p>16 that wasn't functioning properly or the -- and there</p> <p>17 was a functionality problem with the -- with the boat</p> <p>18 itself. They -- at this point they had repaired the</p> <p>19 davit and the fast rescue craft. It was back in</p> <p>20 service. That's basically what I knew of that.</p> <p>21 Q. Okay. Do you recall -- it was -- it was during</p> <p>22 the annual -- it was actually during the annual</p> <p>23 inspection of the Coast Guard this happened?</p> <p>24 A. Where the Coast Guard wrote them for having a</p> <p>25 problem with the --</p>