

Maupoint v LACC. Liebermanre 1st / 2nd Impact Position
change

1 Q. OKAY.

2 A. AND SHORTLY AFTER THAT PERIOD OF TIME, WE IMPACTED
3 WITH THE GROUND.

4 Q. WHERE WERE YOU LOCATED AT THE TIME OF THAT FIRST
5 IMPACT?

6 A. I WAS BRACED, KIND OF SQUATTING BETWEEN THE LAST
7 TWO FULL ROWS IN THE REAR OF THE CARGO COMPARTMENT -- PARDON
8 ME -- IN THE REAR OF THE TROOP COMPARTMENT.

9 Q. SHOWING YOU, AGAIN, EXHIBIT 5, IS THAT THIS AREA
10 RIGHT HERE?

11 A. IT IS.

12 Q. AND YOU BRACED YOURSELF BETWEEN THOSE SEATS?

13 A. I DID.

14 Q. WHAT HAPPENED DURING THAT FIRST IMPACT?

15 A. THE INTERIOR OF THE PLANE, IN MY SECTION, AT
16 LEAST, STARTED TO FALL APART.

17 Q. WHAT DO YOU MEAN BY THAT?

18 A. THINGS WERE FALLING DOWN: SOME PANELING ALONG
19 THE WALLS. THERE WAS A TERRIFIC AMOUNT OF JOLTING AND
20 BUMPING, AND THEN THE PLANE WENT AIRBORNE AGAIN.

21 THE COURT: THE PLANE WHAT?

22 THE WITNESS: THE PLANE WENT AIRBORNE.

23 THE COURT: YES.

24 BY MR. HORVATH:

25 Q. AND THEN WHAT HAPPENED AFTER THAT?

1 A. IT LANDED AGAIN.

2 Q. AND WHAT WAS THIS SECOND LANDING LIKE?

3 A. PRETTY SIGNIFICANT. THERE WAS FIRE COMING UP
4 THE STAIRWELL. THERE WAS SMOKE, VERY ACRID FUMES, A LOT
5 OF GRATING AND SHEARING NOISES. I COULD SEE A HOLE BEING
6 WORN AWAY INSIDE OF THE PLANE.

7 LOTS OF MUD AND WATER AND RICE-PADDY WHATNOT STARTED
8 COMING UP THE STAIRWELL.

9 Q. WHAT HAPPENED TO YOU DURING THIS SECOND IMPACT?

10 A. I HAD BRACED MYSELF DOWN BETWEEN TWO ROWS OF
11 SEATS AND HAD MY ARMS SPREAD ACROSS SEATS WITH THE CHILDREN,
12 AND AT SOME POINT DURING THIS TIME I WAS MOVED FROM ONE
13 SECTION OF SEATS TO ANOTHER SECTION OF SEATS.

14 Q. WHAT DO YOU MEAN BY THAT?

15 A. I WAS PROPELLED BY A FORCE GREATER THAN MYSELF.

16 Q. DID YOU GO OVER THE SEATS?

17 A. YES, I DID.

18 Q. AND HOW FAR FORWARD DID YOU GO?

19 A. NOT VERY FAR. I LANDED -- I WOULD SAY IT WOULD
20 PROBABLY HAVE TO BE THE DISTANCE NO GREATER THAN THE NEXT
21 ROW. SOMETHING WAS INFLATED AGAINST AN EMERGENCY DOOR,
22 AND THAT IS THE GENERAL AREA THAT I LANDED.

23 Q. DID YOU SAY SOMETHING WAS INFLATED?

24 A. YES.

25 Q. DO YOU KNOW WHAT THAT WAS?

1 A. A LIFE RAFT, OR A LADDER, OR A CHUTE -- PARDON
2 ME -- A SLIDE, WHATEVER THEY CALL IT. I AM NOT SURE WHAT
3 IT WAS. IT WAS SOMETHING INFLATED.

4 Q. OKAY.

5 AFTER THE PLANE CAME TO A STOP, WHAT DID YOU DO?

6 A. I STOOD UP, AND I WENT TO THE NEAREST EXIT THAT
7 WAS OPEN. I AM NOT AWARE OF WHO OPENED IT. IT WAS ON MY
8 RIGHT, AS I WAS FACING THE FRONT OF THE AIRCRAFT.

9 I LOOKED OUTSIDE, AND I SAW THAT THERE WERE TWO CHILDREN
10 LYING DOWN IN THE MUD, FACE DOWNWARD, AND I WENT OUTSIDE --

11 THE COURT: YOU SAW WHAT?

12 THE WITNESS: THEY WERE FACE DOWN IN THE MUD.

13 THE COURT: WHAT WAS?

14 THE WITNESS: TWO CHILDREN.

15 THE COURT: ALL RIGHT.

16 THE WITNESS: I WENT OUTSIDE THE AIRCRAFT. IT
17 WAS NOT A VERY SIGNIFICANT DROP, MAYBE FIVE OR SIX FEET
18 TO THE GROUND FROM THE EMERGENCY EXIT. SO I JUMPED OUTSIDE.
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22 I FOUND SOME BANDAGES AND HANDED THEM OUT, OR THREW THEM
23 OUT, TO DR. STARK, WHO WAS ATTENDING THAT CREWMAN.

24 I WENT BACK TO THE REAR OF THE AIRCRAFT AND PROCEEDED
25 TO START UNLOADING CHILDREN. THERE WAS A LINE FORMED BY

1 Q Now, can you look at the large diagram behind
2 you and point to the area where you have just indicated
3 the "x".

4 A In this area (indicating).

5 Q Next I would like you to indicate on Defendant's
6 D-1210 your location at the time of the first impact. Mark
7 that with a 2, please, and could you again point to the
8 chart and indicate where you have just drawn that.

9 A Right between these two seats (indicating).

10 Q Thank you very much.

11 Could you indicate for us how you were positioned
12 at the time of the first impact.

13 A In a semi-crouch, my arms spread out over the
14 seats.

15 Q And which direction were you facing?

16 A I was facing the front of the plane.

17 Q Did your position change between the time of
18 the first impact and the second impact?

19 A Yes, it did.

20 Q Could you please indicate for us your position
21 at the time of the second impact and mark that with No. 3.

22 A (Witness complies)

23 Q Could you indicate on the large diagram where

1 you have just marked that position.

2 A This area (indicating) and in this area
3 (indicating).

4 Q You were moving during the second impact?

5 A Yes, I was.

6 Is that clear enough for you?

7 Q Thank you very much.

8 MR. CONNORS: Off the record.

9 (Discussion off the record)

10 MR. CONNORS: On the record.

11 BY MR. CONNORS:

12 Q Now I would like to show you a black and white
13 photograph which has been previously marked as Plaintiffs'
14 Exhibit 2-T and ask you to look at that photograph, please.

15 Does that photograph accurately represent the
16 manner in which the children were seated in the aircraft
17 at the time the aircraft took off?

18 A Some of the smaller children were seated that
19 way, yes. The larger children, not so.

20 Q With regard to the smaller children, would this
21 picture accurately reflect their position and the method
22 of securing them in their seats throughout the period of
23 the flight?

1 (Discussion off the record.)

2 MR. CONNORS: On the record.

3 BY MR. CONNORS:

4 Q Ms. Lievermann, you indicated that you were not
5 a Registered Nurse but a Vocational Nurse, is that correct?

6 A A Licensed Vocational Nurse, yes.

7 Q Did you, in your nurse's training, ever receive
8 specific training on the effects of atmosphere on persons
9 at altitude and high altitudes?

10 A Not directly, sir.

11 Q You stated that, at the time of the first impact,
12 you were crouched between two rows of seats, is that correct?

13 A That is correct.

14 Q Did you have a seat belt on?

15 A I did not have a seat, sir.

16 Q You had no seat and no seat belt, is that
17 correct?

18 A That is correct.

19 Q And there was nothing restraining you, is that
20 correct?

21 A That is correct.

22 Q Were you able to maintain your position during
23 the first impact?

1 A I was able to maintain a general semblance of
2 a position by holding on to the arms of chairs of seats. I
3 did get thrown around.

4 Q During the second impact you indicated that you
5 moved from that area, it looks like behind the row of seats?

6 A Off to the side an between another row of seats,
7 yes.

8 Q Did you move for any appreciable distance from
9 the original position?

10 A For being an involuntary movement, yes.

11 Q How far did you move?

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15 immediately behind your original position?

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17 Q My question is really you moved only the distance
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19 A Yes, basically.

20 Q And you were not thrown forward of the aircraft
21 other than that distance, is that correct?

22 A I don't recall being thrown any further than that,
23 no.

1 Q Did you receive any fractures as a result of this
2 accident?

3 A Not that I was aware of.

4 Q Did you receive any head injury?

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6 Q You described the flight, a charter flight, I
7 believe, on the day after the accident, is that correct?

8 A Yes, sir.

9 Q And was that a flight by Pan Am Airways?

10 A It was, sir.

11 Q Was that a special flight late on for the
12 evacuation of the children?

13 A In a manner of speaking, yes.

14 Q You described the children on that aircraft and
15 distinguished between the behavior of the children who had
16 been on the C5-A aircraft the day before and children on
17 the flight who had not been on the C5-A, is that correct?

18 A Yes. Correct.

19 Q And you described the children who had not been
20 on the flight as normal while the children who had been in
21 the accident acted as agitated or any other word you would
22 care to use to describe it?

23 A That is correct, for their mental attitude. We're

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Thomas Toros K. Der Dourian

Official Court Reporter

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Christine Lievermann

Echs. —

① = location at time of explosion

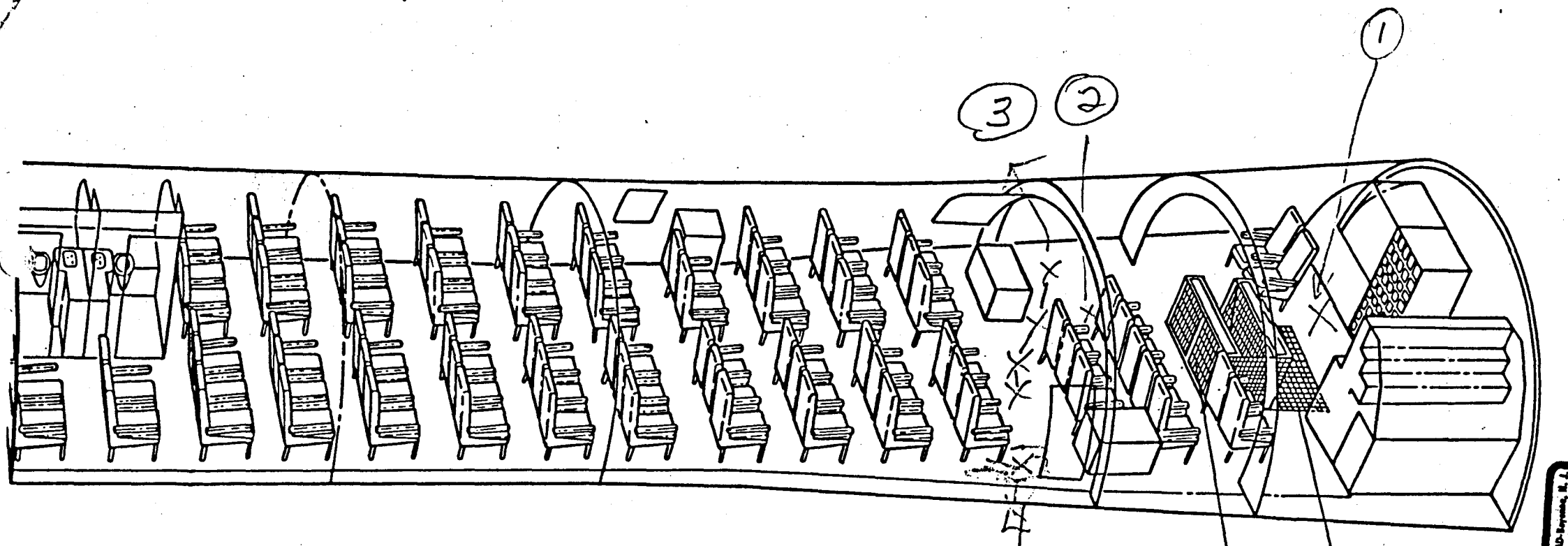
② = location at time of 1st impact

③ = " " 2nd impact

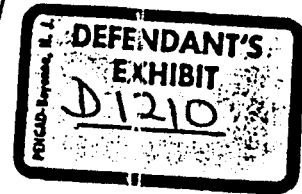
④ = areas where she saw "holes"

Draft Ex 1210-A
11/3/81
S.M.

EM
13



C5AM-4 MASTER



40"x64" GRILL

WIRE MESH ENCLOSED
40"x64" STAIR-WELL

LEVERMAN ON AER POSITIONS
2 - 2 INTERVIEWS