

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

- - -

IN RE:

AIR CRASH DISASTER NEAR SAIGON, : Miscellaneous No.

SOUTH VIETNAM, ON APRIL 4, 1975 : 75-0205

Washington, D.C.

Tuesday, October 24, 1978

- - -

DEPOSITION OF:

NEILL
HARRIETT (GOFFINET) *NEAL*

called for examination by Counsel for the Plaintiff's Lead
Counsel Committee and Subcommittee for Foreign Nationals, pur-
suant to agreement of Counsel, in the offices of Cole and
Croner, P.C., 1730 K Street, N.W., Washington, D.C. 20006,
beginning at 9:30 a.m., when were present on behalf of the
respective parties:

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WASHINGTON, D.C.

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I N D E X

<u>WITNESS:</u>	<u>DIRECT EXAMINATION</u>	<u>CROSS EXAMINATION</u>	<u>REDIRECT EXAM</u>	<u>RECROSS EXAM</u>
Harriett Neal	5	50	81	89
		57	92	90

- - -

EXHIBITS

<u>DEFENDANT'S</u>	<u>FOR IDENTIFICATION</u>	<u>IN EVIDENCE</u>
H (Statement given to collateral board)	58	

P R O C E E D I N G S

2:35 p.m.

Whereupon,

HARRIETT (GOFFINET) NEAL

was called for examination by Counsel for the Plaintiff, and having been first duly sworn, was examined and testified as follows:

DIRECT EXAMINATION

By Mr. Lewis:

Q. What is your name, please?

A. Harriett Neal.

Q. And, what is your home address?

A. 3191 Lakin Park Court, Fairfax, Virginia.

Q. And, where are you employed?

A. Dr. Julius Fogel's office, 2201 "L" Street, N.W.

Q. In Washington, D.C.?

A. In Washington, D.C., yes.

Q. When the C-5A crash occurred, what was your name?

A. Harriett Goffinet, Lieutenant.

Q. And, were you serving with the Air Force at that time?

A. Yes, I was.

Q. Following the crash, were you given an opportunity to

explain what happened and give anybody an interview?

A. Yes.

Q. Did you make any statements for anybody?

A. Yes.

Q. Do you remember who?

A. It was a Statement of Collateral and an Accident Investigation Board.

Q. Did anyone promise you that your statement was going to be secretive or otherwise kept confidential?

A. I don't remember.

Q. You don't recall anybody telling you that?

A. I don't remember whether they did or not.

Q. All right. When did you first learn that you were going to accompany the C-5A on the so-called baby lift operation?

A. The day of the baby lift operation.

Q. Do you remember when that was?

A. April 4, 1975.

Q. And, where were you stationed at that time?

A. Clark Air Base.

Q. What briefing, if any, was given you prior to leaving for Vietnam?

A. We were given a crew briefing, a medical crew brief-

ing, such as we normally received before we left. We were told that we were picking up the orphans in Saigon, and that is just about it, that I remember.

Q. All right. Who was in charge of the medical detachment on this aircraft?

A. Captain Mary Klinker.

Q. And, was she a nurse?

A. Yes.

Q. Did she survive the crash?

A. No, she did not.

Q. Did she brief you?

A. Yes.

Q. Can you tell us what she told you about -- you know, the significant parts of the trip to say it did involve children and special instructions involving the orphans?

A. I sure can't. I am sorry; I just don't remember.

Q. That is all right.

A. I just don't remember.

Q. Did you take any special equipment, supplies?

A. We took the medical supplies, a drug kit that the 141 nurses normally carried on their air vac missions. As far as the other equipment, I'm not sure what was there. I didn't

load it. The med techs did.

Q. Were there any cribs or bassinettes for infants?

A. Not that I know of.

Q. Infant blankets and things of that nature?

A. Not that I know of. I don't remember.

Q. How long did the trip take through Saigon?

A. I believe it is about three hours.

Q. Did anything happen of note that you can recall on

that trip?

A. No.

Q. And, you arrived at the airport in Saigon?

A. Tan Son Nhut, yes.

Q. Were the children ready for your departure?

A. No.

Q. How long did you wait there?

A. It was longer than 15 minutes, but it was not an hour. Other than that, I can't tell you.

Q. How did they arrive?

A. The children did not arrive at the 141.

Q. You were on the 141?

A. I was on the 141 going over.

Q. And, you were to come back on the C-5A?

A. I was to come back on the 141.

Q. Well, you did start back on the C-5A?

A. Yes.

Q. Because there was a change in plans?

A. Yes.

Q. All right. At what point did you first see the children?

A. When I boarded the C-5A.

Q. And, were they already on board at that time?

A. Yes.

Q. And, what was their general condition at that time?

A. They were very warm. It was hot in Vietnam. They were crying. A lot of them were scared.

Q. Did they look healthy?

A. Yes, they did.

Q. Aside from being uncomfortable, they were in reasonably decent shape from your observation?

A. To the best of my knowledge, yes.

Q. All right. How long were you on the ground in the C-5A? I mean, you, personally, before the airplane took off. Do you remember?

A. I can't tell you. I just don't know.

Q. What can you tell us about was there any briefing given to the children in Vietnam?

A. I have no idea. If there was, it was before I got on.

Q. Right. You didn't hear any?

A. I didn't hear any, no.

Q. All right. Was there any new briefing of the medical people?

A. Yes.

Q. All right. Who gave that?

A. One of the flight crew members and I don't know his name.

Q. All right. A man?

A. Yes.

Q. Was he a medical person?

A. No. He was a flight crew member.

Q. What did he say?

A. I just can't really tell you. He familiarized us with the inside of the C-5A troop compartment because I, at least, had never been inside. Basically, it was a familiarization.

Q. He didn't go into what to do in case of an explosive decompression or anything like that?

A. No, there was no need for him to.

Q. No, but he --

A. Not that I can remember, no.

Q. Okay. Was there any briefing of the personnel other than the medical people? I am speaking of the civilians on the airplane by the military?

A. I don't know.

Q. Did anybody brief you on the oxygen supply for the children?

A. No.

Q. Where were the children located on the airplane?

A. The children in the seats upstairs in the troop compartment.

Q. Were there any children on the lower deck?

A. I don't know because I was never on the lower deck other than to walk right through and go upstairs.

Q. Did you see any when you went by?

A. No.

Q. Was it empty?

A. No, it wasn't empty. I heard things, but I can't tell you that I saw anything because I wasn't familiar with the inside.

Q. It was open, the open cavernous area, wasn't it?

A. Right.

Q. And, you know there were people there?

A. I knew there were people there.

Q. All right. And, you don't know whether there were children or not?

A. I sure don't. I am sorry.

Q. You don't need to apologize; just do the best you can. Do you speak Vietnamese? ~

A. No.

Q. And, you can't recall any instruction that was given the children about the oxygen or anything like that prior to leaving?

A. No.

Q. How many children were there in a seat?

A. There were two per seat; two infants per seat.

Q. Now, in the compartment that you were in, was it a large compartment?

A. It was pretty large. I don't know how many people it held.

Q. Could you give me a rough idea of how many seats you think it would hold?

A. No, I can't.

Q. Was it more than 10?

A. Yes.

Q. Would there have been more than 50?

A. I don't know.

Q. All right. What area of the compartment were you

in?

A. I was in the forward part of the troop compartment.

Q. And, that was near the latrine?

A. Yes, near the forward latrine.

Q. The forward latrine. Now, what is forward of your area going toward the front of the airplane? Do you remember? Was there anything between you and the flight deck -- the place that the pilots steered the airplane?

A. Not in the troop compartment as far as I can recall.

Q. Was there anything past the compartment that you were in? That is what I am trying to find out.

A. I don't know.

Q. Do you know whether there were any children forward of the area that you were in?

A. No.

Q. Do you know whether there were any seats forward of

the area that you were in?

A. No, I don't believe.

Q. You don't believe there were any seats forward of you

A. No.

Q. All right. Was the takeoff uneventful?

A. Yes.

Q. Were you seated any place?

A. No, I was not seated?

Q. You were standing?

A. Yes.

Q. What other adults were in the compartment that you were in at the time the airplane took off?

A. There were medical crew members, flight crew members, and some civilian -- American civilian women. Other than that, I don't know of anyone.

Q. All right. Who in the way of medical crew members?

A. Okay, there was Lt. Wirtz, Sgt. Hadley, Sgt. Boutwell Sgt. Gmerek.

Q. These are all medical crew?

A. Yes. Lt. Regina Aune. I believe she was -- maybe she was a Captain.

Q. Captain or Lieutenant.

A. Yes.

Q. How do you spell her name?

A. A-u-n-e.

Q. And, that is pronounced Aune?

A. Aune, yes.

Q. Anybody else that you can recall?

A. I can't think of anyone else.

Q. All right. Did anyone say to you up to this point that there was inadequate oxygen for all of the passengers in that compartment?

A. No.

Q. Now, the children that were located that you could see, were they basically little bitty ones?

A. Yes.

Q. What approximate age would you say?

A. Less than a year.

Q. Less than a year, and weighing about how much would you say?

A. I have no idea. I wouldn't guess.

Q. But, typical year or less infants?

A. Yes.

Q. Were they generally of Vietnamese extraction?

A. As much as I can recall, yes.

Q. Some of them were part Vietnamese and part American because they were the children of American service men, were they not?

A. I don't know.

Q. You don't know?

A. I don't know.

Q. All right. How were they located in the seats?

A. They were strapped in with pillows in front of them, two infants per seat, padded between the infant and the seat belt, and they were strapped in.

Q. Okay. Let me see if I can understand it. A child less than a year old isn't very erect in its posture, is it?

A. That is right.

Q. So, were they sort of lying back against the seat back? In other words, was it more or less of a sitting up position or were they lying prone on the seat?

A. No, it was a sitting up position.

Q. A sitting up position?

A. Yes.

Q. All right. How were they padded?

A. They were padded with small airline pillows, and they

were padded with the pillows horizontal over their tummies, and then the seat belt was around them, but there was a pad between them and the seat belt at all areas that I remember.

Q. Okay. In your group?

A. In my group, yes.

Q. Did you have plenty of pillows for the job?

A. Yes.

Q. And, how many of these little tykes did you have under your supervision?

A. About 18.

Q. Okay.

A. 18 to 20.

Q. All right. So that would be -- if we say 18, that would be nine or ten seats full?

A. Right.

Q. How many rows would that have been going across the body of the airplane?

A. One row across the body and two half rows across from the latrine, as well as I can remember. Those were the ones that I was responsible for.

Q. So, you had -- was there an aisle down the middle?

A. Yes.

Q. And, you had both sides of the aisle up that one row?

A. Yes.

Q. All right. Then, two half rows that were not complete because of the location of the latrine?

A. Yes.

Q. However, many seats that was, that was your jurisdiction?

A. Yes.

Q. And, was that in the extreme forward end of the compartment?

A. Yes, it was.

Q. All right. And, the seats faced with the rear of the seat in the direction of travel of the airplane or was it the other way?

A. Yes, we were traveling backwards. The rear of the seat was towards the front of the aircraft.

Q. The takeoff you say was without incident?

A. As far as I can recall.

Q. As far as you can recall. I am not suggesting there was. I am just asking. Okay. About how long had you been flying when the explosive decompression occurred?

A. I can't estimate. I don't know.

Q. So, you wouldn't want to say in minutes?

A. No.

Q. You wouldn't want to make any estimate?

A. No.

Q. All right. What happened when the sudden decompression occurred?

A. There was a pop and all the oxygen masks deployed.

Q. The air seemed to swish out of there?

A. No. No, it didn't. It did not. I just remember the pop. I remember the oxygen masks falling.

Q. What kind of noise was it?

A. It was a pop.

Q. It wasn't loud?

A. It was loud, but it wasn't overly loud. It is hard to recall.

Q. I understand and I am just asking you to do your best. When you say pop, if one opens a soft drink that gives a popping noise. I gather it was much louder than that, or was it?

A. Yes. Yes.

Q. Was it that kind of a noise?

A. As far as I can remember, that is a pretty good

description.

Q. All right. Could you see any small objects flying around -- little pieces of insulation or anything like that flying around the outside of the airplane?

A. I saw small pieces of insulation and people's hair but that was it.

Q. And, was there a wind?

A. Not that I recall.

Q. Did anyone explain to you what had happened?

A. I heard the words "rapid decompression".

Q. From somebody, but you don't know who?

A. I don't know who, no.

Q. Had you had flight training?

A. Yes.

Q. You had experienced this before?

A. Yes.

Q. I gather this was your first actual explosive decompression? Is that correct?

A. We had a rapid decompression in flight school, but this was the first one on duty.

Q. That is what I meant. You had one in training, but this was the first one in actuality, other than training, a

simulated situation.

A. Yes.

Q. All right. And, what did you do then when you heard this loud noise of a popping nature? Does that describe it?

A. Yes.

Q. All right.

A. I put on my oxygen mask and immediately started passing the oxygen masks to the infants. Of course, they were too small to use them themselves.

Q. They couldn't hold them?

A. No.

Q. All right. And, you had 20 or so?

A. 18 to 20.

Q. 18 to 20 kids?

A. Yes.

Q. So, you couldn't give any one child -- I mean you attended them one at a time.

A. Yes.

Q. And, you didn't have any help?

A. No.

Q. So, they got only the oxygen that was in whatever -- that was in the air, plus what you could supplement?

A. Yes.

Q. Did you have an oxygen that you could carry around with you?

A. No, I did not.

Q. Did you take the mask off?

A. Not that I recall.

Q. So you stayed with the mask on. That is what you were instructed to do in school, wasn't it?

A. Yes.

Q. Until somebody told you to take it off?

A. Yes.

Q. And, that was a crew member?

A. Yes.

Q. How long was the tube on your mask?

A. I can't really tell you how long.

Q. Could you reach all of the children?

A. With my arm and with the tube on my mask, yes, except for the back row and I took an oxygen mask from the back row. I switched and walked back.

Q. All right. So, did you divide the oxygen more or less equally among the children?

A. Yes.

Q. Each of the children, if there were 20 and I appreciate that there is some uncertainty as to how many there were, but using that for easier mathematics, if there were 20 children, then each of the children got approximately 1/20 of the oxygen that you got through the mask?

MR. DUBUC: I object to the form of the question.

By Mr. Lewis:

Q. Or was available to them?

A. Yes.

MR. DUBUC: Object to the form of the question.

By Mr. Lewis:

Q. All right. Did the masks have headbands?

A. Yes.

Q. Did they look like one that one sees in a commercial aircraft -- the yellow commercial mask? Would you describe it perhaps I should say.

A. It was like that. I can't remember whether the cup was yellow or white or what color it was, but it was the same.

Q. The color isn't important, obviously, as the shape of it. It was about the same size?

A. Yes, as far as I can remember.

Q. Designed to cover the mouth and nose?

A. Yes.

Q. And, there was a plastic tube of some variety?

A. Yes.

Q. All right. Were the babies all fastened in at this point, were they still tied in?

A. Yes.

Q. Nobody had loosened them up from the takeoff. Is that correct?

A. No.

Q. So, they were all still sitting in a more or less upright position with seat belt across them?

A. As far as I can remember, yes.

Q. Could you reach all the children without unfastening them?

A. No.

Q. You had to unfasten them?

A. I unfastened the ones next to the window -- the one next to the window and then put them back into the seat and then fastened them.

Q. What were they doing at this point? In other words, can you describe their activity?

A. The babies?

MR. DUBUC: Object. What point are we talking about?

MR. LEWIS: I am speaking of after the sudden decompression or rapid decompression.

MR. PIPER: Are you talking about the children?

MR. LEWIS: Yes. The little babies.

WITNESS: Some were awake and some were asleep.

By Mr. Lewis:

Q. All right. Some were asleep or were quiet?

A. They were asleep.

Q. Did any one of them -- were they crying at this point?

A. None of mine.

Q. None of yours were crying. All right. Did you have any trouble with putting oxygen masks over their faces. Did they fight you in anyway?

A. No.

Q. Were they pale?

A. No. I didn't notice it.

Q. You didn't notice. Can you describe their behavior any other way? Is there anything else that you noticed about their behavior until the oxygen masks were taken off?

A. No.

Q. They were essentially quiet or asleep in your group?

A. Yes.

Q. Did your group continue to stay quiet until the crash?

A. As well as I can recall, yes.

Q. Now, describe what happened in the crash. Where were you located physically?

A. I was still in the forward most part of the troop compartment.

Q. Did anyone tell you that the airplane was going to crash land?

A. Not in so many words, no.

Q. Was there any announcement over the -- is there a public address system on the airplane?

A. I don't know.

Q. Do you remember anything that was said over it, if there was one?

A. I don't remember hearing anything.

Q. There wasn't any announcement that you can recall telling you to do any particular thing?

A. No.

Q. Prepare for a crash landing or anything like that?

A. One of the medical crew members just yelled for every

body to brace and that was all.

Q. Did you?

A. Yes.

Q. How were you able to do this?

A. Kneeling on the floor between the seats and bracing myself across the seats.

Q. When you say between the seats, are you speaking of the aisle or between two rows?

A. Between two rows.

Q. So, you were between a seat back and a couple of Vietnamese babies?

A. Yes.

Q. And, you braced your back against I guess the leading edge of the front of the seat? Is that what you did? Which way were you turned?

A. I was facing toward the front of the aircraft.

Q. Were you facing the back of a seat or the front of the seat?

A. I was facing the front of the seat.

Q. So you would be facing the children, then?

A. Yes.

Q. And, you were seated on the floor?

A. I think I was kneeling on the floor.

Q. Okay. Kneeling on the floor.

A. Yes.

Q. And, you had your arms outstretched?

A. No, they weren't stiff. I was sort of hugging the seat in front of me.

Q. All right. Can you tell us how long it was from the sudden decompression until the first impact?

A. I sure can't. No.

Q. I gather you don't know then the period of time between the time you put your mask on and the time you took it off?

A. No.

Q. All right. Did you have any time to observe anybody else during that time that you were trying to give oxygen to the children?

A. I didn't pay any attention. I didn't have time.

Q. I am sure you were quite busy.

A. Yes.

Q. Describe the impact, if you will?

A. I remember a real hard bump, and I remember something hot coming through the grate that was in the very forward most

part of the troop compartment. And, then I just remember being thrown around against the wall.

Q. Were you thrown against the children?

A. Not that I remember.

Q. You might have been, but you don't remember?

A. I don't remember.

Q. Okay. When you say you were thrown against the wall, you were then moved out of your position in between the seats. Is that correct?

A. Yes.

Q. By the course of the --

A. Yes.

Q. I mean you didn't get up and move. You were thrown out.

A. Not that I remember.

Q. What wall did you hit?

A. I hit the forward, I guess, bulkhead, of the troop compartment.

Q. And, to do that you had to go over the seat in front of you to the bulkhead. Is that correct?

A. Not necessarily. I could have been jarred side ways and then gone down the aisle.

Q. All right. Okay.

A. But I don't know.

Q. You would have either gone around or over the top.

A. Yes.

Q. Because there was a seat between you and that bulkhead.

A. Yes.

Q. Okay. Were you stunned when you hit the bulkhead?

A. I didn't pass out as far as I can recall. I was shaken up, but I didn't pass out.

Q. Do people that pass out always know that?

MR. DUBUC: I object to the form of the question. How does she know when somebody passes out, and how does --

MR. LEWIS: I am just trying to --

WITNESS: I've never passed out. I don't really know.

By Mr. Lewis:

Q. Have you seen people in your job as a nurse who have been unconscious and not necessarily have known that?

A. Maybe not known that they were unconscious; they knew something had happened.

Q. But in any event, you say you were stunned in some

way or stopped?

MR. PIPER: She did not say that.

WITNESS: I wasn't stunned; I was shaken up just because of what had gone on, but I was not stunned.

By Mr. Lewis:

Q. All right. You had -- ultimately it turned out that you had a broken bone. Is that correct?

A. Yes.

Q. You didn't feel pain from it at that time, did you?

A. I don't remember that I did.

Q. At some later point, the fracture was quite painful wasn't it?

A. Yes.

Q. So, you were numb at least to that extent, weren't you?

A. I don't remember feeling the pain.

Q. All right. When was the first time that you felt the pain?

A. When I got out the front -- the hole in the front of the troop compartment and tried to pull the crew member out that was blocking the exit.

Q. Now, just before the impact, what was it like on the

airplane? Was it quiet?

A. As far as I can remember, it was very quiet.

Q. Everybody was quiet, waiting for whatever was going to happen?

A. As much as I can remember, yes.

Q. All right.

A. It is not very clear any longer.

Q. I understand. The adults and the children were all quiet and then the impact?

A. Yes.

Q. That is the best to your recollection?

A. That is the best.

Q. Now, the hole that you described was, I gather, not designed by the airplane. In other words, it was caused by the crash. Is that right?

A. The hole that was ultimately there was not part of the design.

Q. So, it was part of the collision -- result of the collision. Who was in the hole?

A. Sgt. Parker, I believe.

Q. Do you know how he got there?

A. No, I don't.

Q. Do you know where he was prior to impact?

A. He was somewhere rear of my position, but I don't know where.

Q. . Did you see him forward at any time?

A. No.

Q. Was he making any noise or calling for help?

A. No.

Q. And, then you tried to pull him out of the hole?

A. Yes.

Q. And, then you noticed for the first time that you had an injury of some kind?

A. Yes.

Q. Did somebody come to help you?

A. There was a young boy outside the aircraft at this point. He had crawled through the same hole and he tried to help me.

Q. Was he a passenger on the airplane?

A. Yes.

Q. And, were you both successful?

A. No, we were not.

Q. How was he finally extracted from the hole?

A. I don't know.

Q. You weren't able to do it?

A. No.

Q. That was the first thing that you did after the plane came to rest, that was to help Sgt. Parker?

A. Yes.

Q. What did you do after that, after you found that you couldn't help Sgt. Parker?

A. When I found that I could not -- my goal was to clear the hole so we could use it as an exit to get the children out. I crawled back through the hole and realized that if we had to use it, we could. It was big enough. We could get around him, and we started carrying babies out.

Q. What was Sgt. Parker's condition at this time?

MR. DUBUC: I want to note my objection. Sgt. Parker case has been discontinued -- on the relevancy of that.

WITNESS: Should I answer the question?

MR. LEWIS: Yes.

WITNESS: Would you repeat it, please?

By Mr. Lewis:

Q. I am not asking you for a complete diagnosis, but I am just asking you what was Sgt. Parker's condition from your observation?

A. Okay. He was lying on the ground. He didn't respond that I did or said.

Q. He appeared to be fair and clean.

A. . Yes.

Q. Now, the children that you were able to get out at first, were they your charges -- the ones from the front of the compartment?

A. Yes, I handed them toward the back of the compartment where the exit's are -- the real exits -- to one of the flight crew members. We just handed them up the aisle, one at a time.

Q. And, were they quiet during this period?

A. They were crying.

Q. And, they were all taken out of the airplane?

A. Yes.

Q. Did you see them after that?

A. I saw some of them in the Seventh Day Adventist Hospital in Saigon.

Q. Do you know which ones?

A. No.

Q. Do you know how many?

A. No.

Q. What were they actually physically doing in the

hospital when you saw them?

A. I remember seeing some of them sitting on the floor in the hall up against the wall. That part of it is very, very fuzzy.

Q. They weren't crawling around; they were just sitting there?

A. I don't remember any of them crawling around.

Q. They were just sitting there watching people go by.

A. Yes.

Q. How young were these children?

A. These are the infants I am talking about.

Q. So, we are talking about children less than a year or around a year old?

A. Yes.

Q. Could you give us any idea of how many you saw there?

A. No, I can't.

Q. Was it 30 or 40?

A. I don't know. I just don't know.

Q. Did you ever see them after that?

A. No.

Q. Prior to the flight these children were scared, I gather.

A. Yes.

Q. Were they frightened after the accident?

A. They were crying. They were crying.

Q. Did they appear frightened to you?

A. Not the babies.

Q. That what I mean.

A. Not the babies.

Q. How were they behaving?

A. They were just crying, for whatever reason babies cry -- uncomfortable -- I don't know.

Q. Do you know what physical examinations was given the babies?

A. No, I don't know.

Q. Do you know whether anybody gave them any clinical tests for high altitude sickness decompression?

A. No, I don't know.

Q. Did you see any of the children at Clark Air Force Base?

A. No.

Q. To your knowledge, did all the adults have the same supply of oxygen that you had?

A. To my knowledge, yes.

Q. Do you know how many babies died in the upper part of the airplane?

A. No, I don't.

Q. Do you know how many adults died in the upper part of the aircraft?

A. I know Sgt. Parker did, but I don't know how many others for sure.

Q. Did you see any of the women?

A. I don't understand. When?

Q. While you were still in the aircraft?

A. Yes, there was one woman lying on the floor who looked seriously injured to me.

Q. Who was that?

(No response)

Q. You may have told me, but what was Sgt. Parker's job?

A. I don't know.

Q. He was not a medical person?

A. He was a flight crew member, but I don't know what his job was.

Q. I was just trying to distinguish between medical and flight crew. There wasn't any time for examination of the children at the crash site, was there?

A. At the crash site, no.

Q. I mean there wasn't a medical team or any examination at that time?

A. No.

Q. So whatever examination was done, either had to be done at the Seventh Day Adventist Hospital or Clark Air Force Base?

A. As far as I know.

Q. If any was done?

A. I don't know.

Q. Do you feel you are knowledgeable in high altitude injuries or space medicine?

A. No. Not any longer, if ever.

Q. If ever?

A. Yeah.

Q. So, is it fair to say ma'am that you aren't really, that you don't really feel professionally capable of diagnosing high altitude injury or decompression injury, if such exists in a child?

MR. DUBUC: I object to the form of the question.

MR. BATTOCCHI: I can't hear what you are saying.

MR. DUBUC: I object to the form of the question. I

don't know what it means. Space injury.

MR. LEWIS: I said space medicine.

MR. PIPER: You said space injury.

MR. LEWIS: I am sorry. I'll state it again. I want to be clear.

By Mr. Lewis:

Q. As a nurse, do you feel qualified to diagnose -- I mean considering your level of training. I appreciate other nurses might be in a different situation. Do you feel qualified to diagnose decompression injuries, if such exist, in infants?

A. I wouldn't at this point, but I did then. Not diagnose, possibly, but pick up the symptoms and know what to do with it and how to deal with it.

Q. I understand. You mean you were trained to give oxygen and to do various things, whatever could be done in order to treat the children?

A. Yes.

Q. On a -- I don't know what the word would be -- but on a clinical, whatever you could do to help people under those circumstances?

A. Yes.

Q. Were you then qualified to tell what percentage of

oxygen at such and such an altitude results in such and such a neurological injury?

MR. DUBUC: I object to the form of the question -- such and such and such and such.

MR. LEWIS: I am just trying to give a general statement.

MR. DUBUC: I am objecting to the form of the question.

MR. LEWIS: I understand and there is no need to argue it.

MR. DUBUC: I did.

MR. LEWIS: Thank you.

WITNESS: Would you please repeat it?

MR. LEWIS: Surely.

By Mr. Lewis:

Q. I am just trying to find out if you are the person that I should ask about the details of high altitude injuries. If you are qualified to discuss it on a medical level, I want to ask you about it. If you are not -- and I am not saying either way because I know I'm not, for sure, I won't take up our time.

MR. PIPER: At this point, I would like to interject

a general objection. As in the previous deposition, it is apparent that Mr. Lewis is reading from and perhaps in some way formulating constrictions from an air force publication that was not in effect in any form either the day of the accident or obviously up to date when the witness took her medical training

MR. DUBUC: I join the objection. I join the objection.

MR. LEWIS: Good. Thank you.

MR. PIPER: Another question.

MR. LEWIS: I said thank you.

MR. PIPER: You are welcome.

By Mr. Lewis:

Q. Do you know what the term "time of use for consciousness" means?

A. Yes.

Q. Will you tell me?

A. Time of use for consciousness means the time between -- it is hard to put into words -- it is the time you have that you are useful after your supply of oxygen is decreased. It would be my time of usefulness after the rapid decompression until I donned my oxygen mask.

Q. Okay. In other words, it is the time you have to act

before you are rendered incapable of acting. Is that what you mean?

A. If you don't donn your oxygen mask, yes.

Q. Do you have any idea, ma'am, how long you went before you put your oxygen mask on?

A. I grabbed it immediately when it fell.

Q. Did it come on immediately?

A. Yes.

Q. Did you have any type of anxiety reaction as a result of the events? In other words, were you frightened?

A. I was frightened.

Q. I am not suggesting there is anything demeaning in it, anybody would.

A. I don't believe you could call it an anxiety reaction as such, but I was frightened.

Q. Were you very, very frightened?

MR. PIPER: Objection to the form of the question.

By Mr. Lewis:

Q. Were you?

A. No.

Q. Did you notice anybody else that was?

MR. PIPER: I object to that in that it is such vague

terms as very, very. Did you notice anybody else who was very, very? I think we are just way off bases.

MR. LEWIS: I'll rephrase.

By Mr. Lewis:

Q. Did you notice anybody else who was quite frightened following the accident?

A. No.

Q. What was your level, in your judgment now, of your capacity to observe the post accident?

A. I don't think I understand what you mean.

Q. I want to know whether you feel that you were quite alert or whether you were because of the accident and injuries whether your alertness was impaired in any way because of the events that had occurred to you?

A. Okay. My alertness was not impaired, but in a situation like that, I tend to focus on certain specific things and not the overall picture. It is a tunnel vision thing. You want to get the job done; that is your immediate goal, and you don't notice the other things.

Q. So, there were many things that you might not have noticed that could have occurred.

A. Yes.

Q. Because you were concentrating on certain things.

A. Yes.

Q. And, what were you concentrating on particularly?

A. At what point?

Q. From the time of the accident until you were treated yourself.

A. Getting the babies out of the aircraft.

Q. And, you were concerned with fire, weren't you?

A. Yes.

Q. And, you thought there was some risk of a further catastrophe, I gather?

A. I thought so because of the fact that I had felt the heat in my face.

Q. You were slightly burned, too, weren't you?

A. Singed a little bit around the ears. That was it.

Q. You had smelled smoke and there did seem to be some evidence of fire?

A. I didn't smell anything; I felt it.

Q. The heat?

A. The heat.

Q. And, of course, you knew as an air force nurse that fire can follow an aircraft accident?

A. Yes.

Q. So, you were concentrating on getting the kids out of the airplane, and away from any further danger?

A. Yes.

Q. Were you also -- did that take all of your time? Or were you able to devote any attention to taking care of some of the adults that had been injured?

A. I covered the adults with blankets, but other than that there just wasn't anything I could do.

Q. What happened to the human beings on the lower deck?

A. I don't know.

Q. What happened to the lower deck?

A. I don't know that either.

Q. Was it there after the crash?

A. Not unless it was under us in the rice --

Q. You didn't see it?

A. No, it was not in my immediate vicinity.

Q. Were the wings broken off the airplane?

A. I didn't see them.

Q. You didn't notice them?

A. No.

Q. All right. Did you notice the condition of the

r fusilage? In other words, the hull section?

A. No.

Q. So, you couldn't tell us how many pieces the hull section was in?

A. No.

Q. I gather you would take a child and hand it to somebody else and there was sort of a bucket brigade to get them out.

A. Yes.

Q. What happened at the other end of the chain?

A. I don't know. I wasn't at the other end.

Q. You don't know whether the babies were taken off someplace?

A. I heard helicopters.

Q. So you think they were being evacuated in some way?

A. In some way, I assumed. I never did go out of the aircraft until I left after I crawled back in.

Q. So, you crawled back in -- now, you are speaking of the hole or the doorway?

A. The hole.

Q. You crawled back in the hole?

A. Yes.

Q. This was a hole in the front where there had been no door before?

A. Yes.

Q. Were you looking for other survivors?

A. I wasn't looking for survivors. I was trying to get Sgt. Parker out of the hole.

Q. This is a second time?

A. No. This was the only one time I went out.

Q. That was right in the beginning.

A. That is right.

Q. And, then the time you left the airplane after that the children had been evacuated.

A. Yes.

Q. You didn't see them but to pass them out.

A. Yes.

Q. Did you find any children that had come out of their seat belts?

A. I found one.

Q. Was it one of your charges?

A. I don't think so. I don't know for sure.

Q. Was it a Vietnamese child?

A. As far as I can recall.

Q. Was it a tiny baby? I mean, was it the size we have been talking about?

A. Yes.

Q. And, where was it located?

A. The baby was on the floor, under a seat asleep.

Q. Did you pick it up?

A. Yes, that was the last baby that I handed out.

Q. What did it do when you picked it up?

A. Woke up and cried.

Q. And, then what did you do with it?

A. Handed it up to the sergeant that was in front of me and he handed the baby up to the next person.

Q. Was this near the last of the children?

A. It was the last one that I handed up. I had gone through the aircraft in the back to make sure that all the babies were out. It was the last one that I found.

Q. Did any of these children have anything with them when they were on the airplane -- a little bag of personal effects, papers, or anything like that?

A. Yes.

Q. Where were they after the crash?

A. They were pinned to the front to the shirt or the

wrapping that the children had on and they were still pinned.

Q. When you last saw them.

A. When I last saw them. Some we took loose.

Q. What do you mean?

A. They hadn't come loose as far as I remember, but some we took loose because they were big and they were bundle-some and we just couldn't deal with everything.

Q. Do you know whether they got out of the airplane on the baby or not?

A. I don't know.

MR. LEWIS: That is all the questions I have of this witness. Thank you.

CROSS EXAMINATION

By Mr. Battocchi:

Q. Ms. Neal, when did you first go into the air force?

A. I went on active duty in January of 1973.

Q. Had you been connected with the air force in any capacity before January 1973?

A. I joined October 1972.

Q. And, where were you stationed from October 1972 to January 1973?

A. I was at home waiting to go on active duty.

Q. Was that somewhere in Indiana?

A. Yes.

Q. Where were you first stationed after January 1973?

A. Eglin Air Force Base in Florida.

Q. For how long were you stationed in Florida?

A. January 1973 to January 1974.

Q. Where were you stationed after January 1974?

A. I was TDY from January 1974 till about mid February at Brooks Air Force Base in San Antonio.

Q. Then, where did you go?

A. Then I went to Clark Air Base in the Phillipines.

Q. Were you there until April 1975?

A. Yes.

Q. When did you leave the air force?

A. I separated March 5, 1975, I believe. I am sorry, May 5, 1975.

Q. It would have to be after the accident.

A. Yes.

Q. You testified, if I recall correctly, that you flew from Clark to Vietnam in a C-141.

A. Yes.

Q. Had you flown on C-141 once before?

A. No.

Q. Were you a flight nurse from January 1973 until April 1975?

A. No, I was a flight nurse from February 1974.

Q. And, what kinds of planes did you fly in from February 1974 until May 5, 1975?

A. C-9 Nightengale.

Q. Is that a hospital configured airplane?

A. Yes.

Q. Did it have a rear cargo door?

A. Yes, not cargo. We didn't carry cargo.

Q. But a door that you opened in the back and went down to the ground?

A. Yes.

Q. Passengers could come up that door?

A. Yes.

Q. Did you ever observe that door open and closed?

A. Yes.

Q. Did you ever observe any problems with the opening and closing of that door?

A. On the C-9?

Q. Yes.

A. No.

Q. Did you ever observe any problems with the opening or closing of the doors on the C-5A?

A. I never did observe the opening and closing of the doors on the C-5A.

Q. Did you marry an air force man?

A. Yes.

Q. Has he flown air force planes?

A. Yes, he has.

Q. Has he flown C-5A's?

A. No.

Q. Has he flown 141's?

A. No.

Q. Has he flown 130's?

A. No.

Q. Is his last name Neal?

A. Yes, it is.

Q. What is his first name?

A. Don.

Q. Is he still in the air force?

A. No, he isn't.

Q. When was he last in the air force?

A. He separated in November 1974.

Q. What did he fly?

A. He flew the EC-140.

Q. As a pilot?

A. Yes.

Q. Did you ever talk with him about the aft ramp or the rear cargo door of the C-5A's?

A. No.

Q. Did you ever hear from him or from anyone else of any problems that were reported a rumor with the rear doors in the C-5A's?

A. No.

MR. DUBUC: I will object to that.

By Mr. Battocchi:

Q. Were you ever on any flights that were aborted because of mechanical problems with an aircraft?

A. No.

Q. Were you in any other aircraft accidents besides this one?

A. No.

Q. Did you give a statement approximately seven pages long to a Col. Waxstein?

A. Yes.

Q. Did you write that statement out yourself?

A. I gave it verbally.

Q. Okay. And, how was it transcribed in the form of a statement?

A. I don't remember.

Q. Did you dictate to a tape recorder?

A. Yes.

Q. I see, and then the statement came out to you for signature?

A. Yes.

Q. And, did you read it and sign it?

A. Yes.

Q. I am going to ask you a question that may seem a little silly to you, but I have to do it for the record. You put in the statement the truth as best as you recalled, didn't you? Is that correct?

A. Yes.

Q. You had absolutely nothing to hidewhen you gave this statement, did you?

A. No.

Q. And, similarly, when you gave the statement to the

member of the Accident Board that you had given earlier, you had nothing to hide.

MR. VAN NUYS: Objection.

By Mr. Battocchi:

Q. Do you have any problem at all with our reviewing the statement that you gave to Col. Waxstein?

A. No.

Q. Do you have any problem at all with our obtaining the copy of the statement that you gave to the Accident Board?

A. No.

Q. Have you ever seen that statement you gave to the Accident Board?

A. I don't think. I don't remember, though; it has been four years. I just don't remember.

Q. When you -- how long after the accident was it that you gave this statement to, is it Col. Raymond? Was he the one who took the statement?

A. Yes.

Q. How long after the accident was it that you gave the statement to Col. Raymond?

A. I don't remember.

Q. By the time you gave the statement, was it clear to

you that you had nothing to do with causing this accident?

A. I never did really think that I had.

Q. There was no doubt about that, was there?

A. No, I don't think so.

Q. Do you remember Col. Raymond coming to you and saying to you anything like this -- perhaps you might feel that you were at fault or responsible for this accident and therefore we are going to promise you confidentiality or secrecy. Did anything like that happen?

A. No.

MR. DUBUC: I object to that question.

MR. PIPER: I object.

By Mr. Battocchi:

Q. Is it fair to say that you have no recollection whatsoever of Col. Raymond ever promising you any confidentiality or secrecy?

A. Yes, I can say that.

MR. BATTOCCHI: I have no further questions. Thank you very much.

CROSS EXAMINATION

By Mr. Dubuc:

Q. I am going to ask some questions about your state-

ment. I will show you a copy of the statement given to the collateral board consisting of seven pages. I would like you to take a look at it and see if that is an accurate copy of your statement that you gave to Col. Waxstein.

A. All right.

(Whereupon, the document was shown to the witness.)

A. As far as I can tell, it is the one.

MR. DUBUC: Could we mark that Exhibit H for identification.

MR. BATTOCCHI: Can we identify that as a particular tab to the collateral report, also?

MR. DUBUC: Sure. It is Tab 15.

MR. BATTOCCHI: Tab 15. Thank you.

(Whereupon, Defendant's Exhibit H was marked for identification.)

By Mr. Dubuc:

Q. I believe you answered the question as to how you went from Clark Air Force Base to Saigon, and I think you said you went on a C-141. Is that correct?

A. Yes.

Q. How was that configured?

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A. We had cargo in the back, and there were a few seats in the forward part closest to the flight deck of the cargo compartment.

Q. When you say a few, how many would that be? More than 10, less than 10, more than 20, less than 20?

A. Not more than 20.

Q. And, were you carrying cargo?

A. Yes.

Q. Were you also carrying medical equipment?

A. Yes.

Q. Had you ever been on a 141 before?

A. I had been in one.

Q. You had never flown on one?

A. No.

Q. Is that airplane subject to reconfiguration -- in other words, can you change it from an all cargo plane to an all passenger plane, or a partial passenger and partial cargo as it was when you flew on it?

A. Yes.

Q. How do they do that -- just put in different seats?

A. I am not sure how they do it. I don't know.

Q. Have you ever seen the C-141 fully passenger

configured?

A. A mockup in flight school, I believe.

Q. Were you trained on a 141 that belongs to the C line?

A. I was trained very vaguely in flight school. Vaguely is not the right word, but very minimally and then I was qualified on the C-9 at Clark when I got to the squadron.

Q. Do you recall how many seats there are on a C-141 in passenger configured?

A. No.

Q. Do you recall how many seats there are on a C-9 when fully passenger configured?

A. I think there are forty some. I believe.

Q. You mentioned the briefing that you had that was give I think you said Clark Air Force Base in the Phillipines by Capt. Klinker.

A. Yes.

Q. How long did that briefing last?

A. I don't remember, just a few minutes.

Q. More than 10 or less than 10?

A. I don't know.

Q. I think you also referred to a briefing you received when you boarded the C-5 airplane as to troop compartment

familiarization.

A. Yes.

Q. How long did that briefing last?

A. Again, just a few minutes. I can't tell you how long.

Q. What was included in that briefing?

A. Interior familiarization -- exits, where the coffee was, where the juice was, where the infant supplies were.

Q. Were they carrying any life rafts?

A. I don't know.

Q. Do you recall it being mentioned in your briefing?

A. I don't remember it, if it was.

Q. Did you see any life rafts?

A. No.

Q. Would you recognize a life raft station if you saw one?

A. Yes.

Q. In your statement which we marked Exhibit H for identification on the first page, about midway down the page there is a reference to a number of vehicles about the C-5. Do you see that sentence?

A. Yes.

MR. BATTOCCHI: For clarity, can we read it into the record because I don't see it.

By Mr. Dubuc:

Q. The sentence says that there were quite a few vehicle around the C-5 and it seemed like a lot of confusion. See that sentence?

A. Yes.

Q. How many vehicles did you observe, approximately?

A. I don't know; I didn't count them.

Q. Were they military type vehicles?

A. I don't remember.

Q. Did you observe any portion of the unloading process when the aircraft arrived in Saigon?

A. When the C-5 arrived?

Q. Yes.

A. No.

Q. You mentioned that there were two children per seat in response to some of Mr. Lewis's questions.

A. Yes.

Q. In your statement on page one, there is also a statement to that effect: "There were two babies to a seat."

A. I see it.

Q. Do you see that?

A. Yes.

Q. There is also a reference three sentences later, I think it is, which reads: "We have the older children looking after the younger children who were seated in the seats next to them." Do you see that?

A. Yes.

Q. How many "older children" approximately were there?

A. I don't know because I just noticed that as I was walking through to my station in the forward part. I have no idea.

Q. When you use the term older children, what age group were you referring to?

A. Anywhere from 5 to 9, maybe a few years older than that; kids who were not teenagers.

Q. Were these older children in many of the seats with a younger child?

A. There were none back where I was.

Q. And, that would include one full row and two half rows.

A. Yes.

Q. You do refer to the fact that they had older children.

looking after younger children seated next to them.

A. Holding juice bottles.

Q. Were there a fair number of these older children?

A. I remember quite a few, not half.

Q. Slightly less than half.

A. Less than half; I don't know how much less than half.

Q. You mean less than half of the total number of children in the troop compartment were older children?

A. Yes.

Q. Were those children that you described as older children, in your opinion as a nurse, capable of hold an oxygen mask to their mouths?

A. Some were.

Q. Some of the older in that age group?

A. Yes.

Q. You mentioned some ladies who brought the orphans aboard. It is also in that first page paragraph. In fact, several lines that read: "There were ladies who had brought the orphans to the aircraft sitting around the rear loading ramp at the bottom of the stairs."

MR. BATTOCCHI: Rear loading ramp?

MR. DUBUC: Yeah.

By Mr. Dubuc:

Q. Two sentences later: "The ladies apparently were to accompany the children." Did some of those ladies accompany the children and ride in the troop compartment?

A. I don't remember any specific women. I don't know if it was the women that I saw downstairs that were upstairs with us.

Q. Do you know approximately how many women there were?

A. No, I don't.

Q. I think you indicated in response to one of Mr. Lewis's questions that all of the adults were not seated; in other words, they did not have restraining devices. Is that right?

A. I did not know of any that were seated.

Q. Was Sgt. Parker one of those who was not seated?

A. I don't know; he was behind me.

Q. Were Lt. Aune and Lt. Wirtz also either standing or not restrained by any seat belt?

A. As far as I know, but I didn't see them.

Q. How about Sgt. Hadley, Sgt. Boutwell, and Sgt. Gmerch?

A. The same goes for them. I did not see where they were positioned or how they were positioned.

Q. But to your best recollection, none of the adults had any seat belts?

A. That is correct.

MR. LEWIS: Attention. She said that she didn't see them. She doesn't know. So how can she have a best recollection that they didn't have seat belts if she didn't see them? I think you are not being fair to the witness.

By Mr. Dubuc:

Q. I'll refer to your statement on page two. About a quarter of the way down the page, you state: "As far as I know no crew members, flight or medical, or civilian had seats. Do you see that sentence?"

A. Yes.

Q. Does that refresh your recollection as to whether any of the crew members, medical crew members or civilians, or flight crew members had seats?

A. I didn't see anyone that did.

Q. And, your recollection at the time you gave this statement was better than it is today. Is it not?

A. I would say so, yes.

Q. And, that is the way you recorded then. Is that correct?

A. Yes.

Q. And, that is true and accurate. Is it not?

A. As far as I can tell you, yes.

Q. All right. You mentioned in response to some of Mr. Lewis's questions that in the beginning when the children were on the airplane, many of them were crying. Is that correct?

A. Yes.

Q. And, does there come a time when most or all of them are quieted down or asleep or took nourishment?

A. A lot of them did after we took off.

Q. And, is that possibly because it became a little cooler?

A. Yes, it was.

Q. You mentioned on page two of your statement, a twelve year old boy. Do you see that?

A. Yes.

Q. Is this the same boy that attempted to help you go through the hole inside the aircraft?

A. Yes, he is.

Q. Do you know where he was seated?

A. As well as I can remember, he had been back to the

latrine, and he was seated fairly close to me. I remember seeing him but I can't tell you exactly where he was. He was not in a seat. The load -- not the loadmaster because I don't know -- one of the flight crew was by me in the rear and he had the twelve year old boy sit against something.

Q. During the time you were trying -- he was trying to assist you to evacuate children through that hole, did you have occasion to talk to him?

A. Yes, I did. He was not trying to assist me in evacuating children through the hole.

Q. Oh, I see. Was he able to speak English?

A. Yes.

Q. With respect to these older children you described as 5 to 9, did any of them get together and could they speak English, do you know?

A. I don't know.

Q. You described this twelve year old child as an American boy?

A. Yes.

Q. Were any of those older children 5 to 9 Americans, or appear to be Americans?

A. I didn't see any that did.

Q. Did you talk to any of the other children in the troop compartment?

A. No.

Q. Do you know of any other medical crew member who talked to any of the children?

A. I don't know anyone specifically, but there were medical crew members assigned to those children.

Q. You answered some questions about how it sounded at the time of the rapid decompression. Do you remember those questions?

A. Yes.

Q. You described it as a loud pop and you compared it to perhaps an exaggerated opening of a soda pop bottle. Is that right?

A. Yes.

MR. LEWIS: I think she said a soft drink can.

By Mr. Dubuc:

Q. Was it a soft drink can or a soda bottle?

A. I don't remember what I said. I really don't distinguish one --

Q. Well, how would you compare it? Did it sound like the opening of a soda bottle or did it sound like an opening of

a soft drink can?

A. It was not a tinny sound; it was probably more like a soda bottle. Now, that you say it, it was a full pop. It wasn't a click.

Q. Did you hear anything else in connection with that sound? Did you hear any other sound in connection with, prior to or right after you heard the pop?

A. No, I didn't.

Q. None at all?

A. Nothing that stuck in my memory.

Q. You were focusing on the pop. Is that correct?

A. If you would like to say that, yes.

Q. In your statement on page two, towards the bottom of the page, you described what you heard, and the sentence reads: "It was just almost a classic textbook rapid decompression, the way we had learned it at flight school, which is why I think everyone reacted so well because we had been through it before in flight school and a training situation." Do you see that sentence?

A. Yes.

Q. And, when you use the words "classic textbook rapid decompression", what do you mean?

A. A loud sound, condensation in the air; there was a slight feeling of coolness -- not much, but just enough that you could tell. Things came loose around the interior of the aircraft. Nothing flew around, but it tore the bits of the insulation apart.

Q. And, that is something you say you were trained to anticipate in flight school. Is that correct?

A. Yes.

Q. Did they give you any circumstances or possible situations where you might experience such a classic decompression?

A. Yes.

Q. What were some of those?

A. A hole in a pressurized aircraft and anything that would cause a hole, like collision in midair, a window blowout -- anything that would cause a hole in a pressurized cabinet.

Q. Now, you were trained to be a flight nurse on an air vac type flight medical crew. Is that correct?

A. Yes.

Q. And, in connection with that kind of activity, would it be anticipated that the aircraft might find the areas where there was combat or near combat?

A. I don't know whether it was anticipated or not. I don't think anyone really ever said.

Q. In connection with your training as to classic textbook rapid decompression, was the possibility an aircraft being struck by gun fire or missile suggested or mentioned?

A. Mentioned, not suggested.

Q. That would cause a hole because of rapid decompression.

A. That is right.

Q. I believe you were asked some questions about the training you received as to recognizing or dealing with passengers who might be the subject of the effects of the rapid decompression. Do you remember those questions?

A. Yes.

Q. I believe there were also some technical questions asked of you concerning whether you had been trained to recognize symptoms of lack of oxygen or hypoxia as it is sometimes called. Is that what you call hypoxia?

A. Yes.

Q. What training did you receive as to the recognition of such symptoms?

A. We went through the altitude chamber ourselves so

that we would know what the symptoms felt like when we experienced them. Also, there was classroom training, including the size and symptoms of hypoxia.

Q. And, what were they according to your training?

A. The two that I remember the most and the two that I can pull out of my hat right now are duskiness, paleness, and sleepiness, an inability to function to your capacity when you are alert.

Q. Now, did you observe any of those symptoms on any of the children or passengers that were within your care and control after the decompression up to the time of impact, the time of the accident?

A. No, I did not.

Q. Did you observe any of those symptoms as to any of those passengers that were under your control or care or that you may have handled during the evacuation exhibit those symptoms?

A. No.

Q. Now, I think you described the procedure by which you administered supplemental oxygen to those children who were assigned to you in the various seats.

A. Yes.

Q. I think you mentioned that in doing that you at some point from time to time switched oxygen masks from one you initially used to perhaps another one in the vicinities where you could reach all of the children.

A. Yes.

Q. And, of course, during the time you switched you were not getting oxygen, yourself, were you?

A. No.

Q. And, did you have a regular sequence of doing that so that you were working in an attempt to constantly administer some supplement oxygen to each of those children on a regular basis?

A. Yes, I did.

Q. Now, in connection with your training on hypoxia or the lack of oxygen, was it mentioned -- during your training in connection with the effects of hypoxia or the lack of oxygen, were you given any indication that it is a function of altitude and time from which you are not getting oxygen?

A. Yes.

Q. Do you recall any figures as to the maximum altitude with which you can function for any period of time without the use of oxygen? 10,000 feet or 13,000 feet or 25,000 feet?

A. No, that comes off a graph and there is no reason to really know it.

Q. Now, in a situation where, say an aircraft is at 23,000 feet and the rapid decompression occurs and the aircraft immediately begins to descend, as the aircraft descends, the time during which you can get along without oxygen increases, does it not?

A. Yes.

Q. And, at some point you reach an altitude somewhere between 23,000 feet and 10,000 feet, for example, where you do not need oxygen at all. Is that correct?

A. That is correct.

Q. Does the figure 18,000 feet have any significance to you in that connection?

A. It doesn't mean anything to me anymore. I have been away from it too long.

Q. I believe in response to some questions, you indicate that you were thrown forward in some way and were shaken up by hitting the forward bulkhead. Is that correct?

A. Yes.

Q. Do I understand your testimony, however, that you believe your perceptive powers to have remained in tact?

A. Yes.

Q. And, indeed, your powers to function and to aid in evacuation of the children remained in tact, did they not?

A. I believe so, yes.

Q. In fact, you conversed with a twelve year old boy in an attempt to move somebody from the hole you described.

A. Yes.

Q. In connection with your nursing, where did you take your nursing training?

A. The University of Evansville in Indiana.

Q. And, did you work at all in any civilian capacity as a nurse before going in the air force?

A. Yes, I worked all through my training, and I also worked for six months in my home town civilian hospital before I went on active duty.

Q. What hospital?

A. Perry County Memorial Hospital in Tell City, Indiana.

Q. And, did that training include a number of semester hours and also a substantial amount of experience in pediatrics

A. Yes.

Q. Did you have any specialty -- do you have any special interest in your nursing career?

A. No.

Q. I think you mentioned for the most part those persons that you observed and those other persons in the troop compartment that you could hear were called prior to the impact as they sat were strapped in. Is that correct?

A. As much as I can remember, yes.

Q. I think you mentioned that after the impact -- at the time of impact, was there some noise?

A. I just don't remember.

Q. There was a bump, was there not?

A. Yes.

Q. After impact, was there some talking and some people moving around and some atmosphere urgency and some fairly loud voices shouting directions and that sort of thing?

A. Yes.

Q. Is that the kind of circumstance that you would expect might excite a small infant and perhaps make them cry?

A. Yes.

Q. And, would you attribute those infants that were crying that you described as such to have been motivated by those circumstances?

A. I don't know.

Q. You mentioned that you did not notice anyone in the troop compartment who was very frightened. Do you remember those questions?

A. No, I don't.

Q. I believe you indicated that you were frightened, but you would not describe it as an anxiety reaction. Do you remember that, and I think in response to another question, you indicated that you were not very, very frightened.

A. Yes.

Q. And, there was some other questions as to whether you noticed anyone who was very frightened, and I believe you indicated you did not.

A. No, I didn't.

Q. With the exception of the one infant that you mentioned remained asleep throughout the incident, were most of the other children awake?

A. Yes, mine were.

Q. And, were they seated and acting fairly calm prior to the impact?

A. Yes.

Q. Most of those children were in the one to two year old range? The ones that you were assigned to?

A. The ones that I was assigned to were just under a year or maybe a couple of months older, somewhere right in that range.

Q. And, there were more than half of those in that troop compartment in that category, were they not?

A. As far as I know, yes.

Q. Based upon your experience, training and work in pediatrics, would you expect a child of that age to realize exactly what was going on under all these circumstances?

A. Babies?

Q. Yes.

A. No.

Q. You would not expect them to realize.

A. No.

Q. Would you expect them to remember?

A. No.

Q. I think you also mentioned that there was a more or less chain of crew members and medical crew members formed in order to pass the children from hand to hand to the exits and out of the aircraft. Is that correct?

A. Yes.

Q. I think you also stated that after you found the last

infant and passed him along that chain for exiting the evacuation you went out of the aircraft and all of the infants had already been evacuated. Is that correct?

A. As far as I knew.

Q. And, when you evacuated to this hospital, you mentioned the Seventh Day Adventist Hospital.

A. At least part of them were.

Q. Do you know where the other part went?

A. No, I don't. I don't know that they didn't all go there.

Q. In any event, they were all evacuated to their evacuation destination very rapidly, were they not?

A. Yes.

Q. Do you have any idea how long -- how much time expired from the time you started evacuating the children to the time it was finished and you exited from the airplane?

A. No, I have no idea.

Q. Would you say it was more or less than ten minutes?

A. Yes.

Q. Would you say it was more or less than 15 minutes?

A. More.

Q. Would you say it was more or less than 20 minutes?

A. I don't know now. I know it is more than ten minutes but I don't know after that.

Q. Would you say more than ten and less than 20?

A. No.

Q. You don't know.

A. I don't know.

Q. Okay. You mentioned little bags that the children had. Did I understand you to say they were pinned to their shirts?

A. I believe they were, yes.

Q. Do you know what was in those little bags?

A. No.

Q. Did children have any papers pinned to them?

A. Not that I remember.

MR. DUBUC: I have no further questions.

MR. LEWIS: I have a couple questions.

REDIRECT EXAMINATION

By Mr. Lewis:

Q. Prior to this decompression, the pressurization and the oxygen in the environment in the airplane was normal, wasn't it?

A. As far as I know.

Q. You didn't notice any problem?

A. No.

Q. With respect to the removal of, was it Sgt. Parker?

A. Yes.

Q. He was wedged or some way located in this hole?

A. Yes.

Q. Standard procedure would be to allow equal properly trained and physically capable of removing a severely injured person, would it not?

A. I don't know what you mean when you say properly trained.

Q. Well, you had a broken collar bone.

A. Okay.

Q. The child with you had no medical training at all.

A. That is correct.

Q. So, there wasn't a whole person -- a whole medical person available to move Sgt. Parker at that time, was there?

MR. PIPER: I object to that question.

By Mr. Lewis:

Q. I am just saying, weren't you trained not to move people under these circumstances?

A. Usually, yes. Usually, you do not move a person

under his circumstances.

Q. Because he was obviously seriously injured.

A. Yes.

Q. And the reason that you wanted to move him was to get an exit out of the airplane.

A. And also to get him out of the aircraft.

Q. Okay, now, ultimately you learned that there was a door which provided an exit so the kids did not have to go through that hole.

A. I knew that there was a door -- an exit. It wasn't a door.

Q. What I am asking you is do you really think that you were thinking very clearly when you tried to move Sgt. Parker with a 12 year old boy, you being in the condition that you were in?

A. I didn't know I was in that condition until I tried to move him. I didn't realize I had a broken bone until I tried to move him.

Q. Then, do you feel not having realized that you had a broken bone that you were completely yourself?

A. I feel I was.

Q. But you might not have been at that point.

A. I guess the possibility exists.

Q. Just asking you. I am not rebuking on you in any way. I mean it was a very serious accident, I gather.

A. Yes.

Q. A real tragedy. What did you do with this young man in trying to -- physically did you do to Sgt. Parker to try to help him get out of the hole.

A. We put our hands under his armpits which is the way you remove someone if you are not big enough to carry them.

Q. Was there room for, I don't know what you call it, one of those wire litters in there?

A. In the hole?

Q. Yes.

A. I don't remember.

Q. Ordinarily, if you don't know what injuries the person like that has, any movement could be further injuring the patient, could it not?

A. That is correct.

Q. And, so ideally he should be examined by a physician right there in the hole, wouldn't he?

A. That is right.

Q. Before he was moved.

A. But not in a case of a fire.

Q. I understand that. Was there anybody else who tried to help you, any of the other medical crew try to assist you with Sgt. Parker?

A. I don't remember.

Q. They could have but you don't remember.

A. Yeah; I just don't remember.

Q. Who ultimately moved him?

A. I don't know.

Q. Was he burned in the fire?

A. There was no fire.

Q. You put your hands under his armpits in an effort to pull him out and back into the airplane?

A. Pull him out of the airplane.

Q. You were trying to pull him out of the airplane down onto the ground?

A. Yes, level onto the ground.

Q. I understand.

A. Okay.

Q. Was he head down or feet down?

A. His head was toward the front of the troop compartment. His head was toward the hole in the front of the aircraft.

Q. Was he all the way in the hole?

A. I just don't remember.

Q. Can you tell me whether he was partly in the hole and partly in the airplane in the troop compartment?

A. No, I can't. I can't.

Q. But the necessity of moving him was because you thought there was a fire?

A. And, another exit.

Q. And, another exit.

A. Should we need it.

Q. But it was possible if you had had to to pass the children out past Sgt. Parker even though he was there.

A. Yes, when I got back in, I discovered that it was.

Q. Didn't you discover that when you were there with him trying to pull him out of the hole?

A. As I was looking at the hole when we were trying to pull him out, yes.

Q. You and the 12 year old boy were actually in the hole with him, weren't you?

A. Not in the hole; we were outside the aircraft at this point.

Q. How did you get out -- through the hole?

A. That is right.

Q. What was the 12 year old boy doing?

A. He was trying to help me pull Sgt. Parker out and
then --

Q. He was pulling on Sgt. Parker, too?

A. Yes.

Q. Was he holding on to his arms?

A. I don't know.

Q. You don't know what he was doing.

A. No.

Q. Did you continue pulling even after you felt the pain

A. It wasn't so much the pain; it was that I could not
pull. I didn't have any power in that arm at all.

Q. You didn't have any strength. The pain didn't really
bother you so much as the fact that you couldn't physically do
it.

A. That is right.

Q. Because of the lack of strength.

A. That is right.

Q. Apart from a fire, the correct procedure would have
been to leave him there. Is that correct?

A. Yes.

Q. What did you base your premise that there was a fire?

A. The fact that when we hit the ground, I believe the first time I felt heat and cinders hit my face through the grate in the very forward part of the troop compartment.

Q. The airplane had been moving across the ground erodin itself, if you will, or at least when you eroded you can pictur taking off a piece of the airplane or maybe big pieces as it moved across the ground. Wasn't that true?

A. I don't know.

Q. You don't know that.

A. I don't know.

Q. But it had moved across the ground at any event for some distance, had it not?

A. It moved -- yes, it moved across the ground.

Q. Did you consider that that friction had caused any of the heat?

A. I didn't really think about it at that time?

Q. You didn't analyze it?

A. No.

Q. You didn't see any plane?

A. No, not that I recall.

Q. Did you have a fire extinguisher?

A. No.

Q. Did anyone else have a fire extinguisher?

A. I don't know.

Q. Was there a fire alarm called by anyone there inside

--
A. Not that I remember.

MR. LLWIS: Thank you. I have no more questions.

RECROSS EXAMINATION

By Mr. Battocchi:

Q. What kind of mockup of a C-41 did you see in flight school?

A. I don't remember how much of it, but being the entire cargo compartment as far as I remember, and that the back, ramp door; there was no flight deck as far I remember, anyway.

Q. How big of mockup was it?

A. I believe it was actual life size.

Q. Did you ever see the aft ramp door on the mockup of the C-141 open and close?

A. Not that I remember.

Q. Were you ever advised during your training that a rapid decompression might occur because the after ramp or the after cargo door of the C-141 might blow out?

A. I don't remember, but I don't think so.

MR. BATTOCCHI: I have no further questions.

RECROSS EXAMINATION

By Mr. Dubuc:

Q. Would you take a look at your statement on page 4, near the bottom of the page, there is a sentence that states: "The babies looked in pretty good shape after the impact." Do you see that sentence?

(Whereupon, the witness looked at the statement.)

A. Yes.

MR. BATTOCCHI: Wait a minute. Why don't you read the whole sentence.

MR. DUBUC: "The babies looked to be in pretty good shape after the impact."

By Mr. Dubuc:

Q. And, then the next sentence states: "I don't remember seeing any injured babies, whatsoever until we got to the hospital and then those might have been the baby that came out of the bottom. I don't know." Did you see any injured babies, any injured infants, in the troop compartment at the time of the accident or were in the troop compartment?

A. I saw one baby while we were evacuating that I thought was dead.

Q. Is that the only one?

A. As far as I remember, I didn't see any injuries. I didn't see any blood.

Q. Does that pretty accurately describe what you observed at the time of the accident, that the remainder of the babies were in good shape and were not injured?

A. Yes.

Q. Do you know if the one baby that you thought was dead had been strapped in or seated?

A. Yes, the baby was still in the seat, still strapped in.

Q. And, it was, you think dead?

A. I think.

Q. Did you ever get any report as to any diagnosis or whether or not indeed the baby was dead?

A. No.

Q. Do you know if that baby was removed?

A. Yes, the baby was removed. When I went and made my last walk through, it was gone.

Q. And, that is the only one?

A. That is the only one that I remember.

MR. DUBUC: Okay. I have no further questions.

REDIRECT EXAMINATION

By Mr. Lewis:

Q. Back on the record, with respect to the baby that you just mentioned to Mr. Dubuc, would you describe its position in the seat?

A. I don't remember.

Q. Was it sitting up?

A. It was in the seat and the seat belt was still on.

That is all I remember.

Q. It was sitting seated up -- sitting up?

A. I don't remember.

Q. You don't remember.

A. No.

MR. LEWIS: Thank you. That is all.

(Whereupon, at 4:23 p.m., the taking of the oral deposition of Harriett Neal was concluded.)

C E R T I F I C A T E

This is to certify that the attached proceedings of the Deposition of Harriett (Goffinet) Neal in re: Air Crash Disaster Near Saigon, South Vietnam, on April 4, 1975, Miscellaneous No. 75-0205, in the offices of Cole and Groner, P.C., 1730 K Street, N.W., Washington, D.C., Tuesday October 24 1978, were had as herein appears, and that this is the original transcript thereof.



NEAL R. GROSS
Reporter