

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

MICHAEL KHA BOSI, also known as DANG KHA AI, a minor who sues by and through his next friends and adoptive parents, WILLIAM L. and ANNE BOSI, 676 Hicks Street, Fall River, Massachusetts 02724; phone: (617) 679-3380, and by and through his guardian ad litem, CHARLES R. WORK and PEABODY, RIVLIN, LAMBERT & MEYERS, 12th Floor, Connecticut Building, 1150 Connecticut Avenue, N.W., Washington, D.C. 20036; Phone: (202) 457-1016

Civil Action No.  
76-0544-8

Plaintiff

V.

LOCKHEED AIRCRAFT CORPORATION,

Defendant and  
Third-Party Plaintiff

V.

THE UNITED STATES OF AMERICA,

Third-Party Defendant

**Transcript of Video Deposition of:**

**REGINA CLAIRE AUNE**

Thursday, March 9, 1982

Washington, D. C.

**GASDOR REPORTING COMPANY**  
General Stenotype Reporting  
499 South Capitol Street, SW, Suite 408  
Washington, D. C. 20003

Deposition of REGINA CLAIRE AUNE, was taken, pursuant to notice, before Albert J. Gasdor, a Notary Public in and for the District of Columbia, commencing at 11:04 o'clock, a.m., Tuesday, March 9, 1982, in Conference Room A, United States Department of Justice, 10th & Pennsylvania Avenue, N. W., Washington, D. C.

APPEARANCES:

On behalf of the Plaintiff:

MICHAEL J. McMANUS, ESQ.  
Lewis, Wilson, Lewis & Jones, Ltd.  
2054 North 14th Street  
Arlington, Virginia 22216  
Phone: (703) 527-8800

On behalf of Defendant Lockheed:

JOHN J. CONNORS, ESQ.  
Haight, Gardner, Poor & Havens  
Suite 1000  
1819 H Street, N. W.  
Washington, D. C. 20006  
Phone: (202) 775-1300

# I N D E X

Tuesday, March 9, 1982  
Washington, D. C.

Deponent:

DIRECT    CROSS    REDIRECT    RECROSS

REGINA CLAIRE AUNE

4            39            75            82

# E X H I B I T S

FOR IDENTIFICATION

Defendant's Exhibit D-1210-Aune

1 MR. CONNORS: PRESENT TODAY AT THIS DEPOSITION,  
2 MR. AL GASDOR, COURT REPORTER; MR. VYROS, THE VIDEO  
3 PHOTOGRAPHER; AND THE WITNESS TODAY WILL BE REGINA CLAIRE  
4 AUNE.

5 I WILL ASK THAT THE REPORTER SWEAR THE WITNESS,  
6 PLEASE.

7 WHEREUPON

8 REGINA CLAIRE AUNE,  
9 HAVING BEEN FIRST DULY SWORN BY THE NOTARY PUBLIC,  
10 WAS EXAMINED AND TESTIFIED AS FOLLOWS:

11 DIRECT EXAMINATION

12 BY MR. CONNORS:

13 Q WOULD YOU TELL US YOUR NAME, PLEASE?

14 A MY NAME IS REGINA CLAIRE AUNE.

15 Q AND WHAT IS YOUR CURRENT ADDRESS?

16 A MY CURRENT ADDRESS IS [REDACTED]

17 [REDACTED] LAYTON, UTAH, [REDACTED]

18 Q AND WHAT IS YOUR CURRENT OCCUPATION?

19 A I AM A FAMILY AND COMMUNITY HEALTH NURSING  
20 INSTRUCTOR FOR THE COLLEGE OF NURSING AT THE UNIVERSITY OF  
21 UTAH.

22 Q ARE YOU A REGISTERED NURSE?

1 A YES, I AM.

2 Q WOULD YOU TELL US A LITTLE BIT ABOUT YOUR  
3 EDUCATIONAL-BACKGROUND, PLEASE? - - - - -

4 A OKAY. I HAVE A BACHELOR OF SCIENCE IN NURSING  
5 DEGREE FROM ST. JOHN'S COLLEGE WHICH I WAS AWARDED IN MAY OF  
6 1969. I HAVE A MASTER OF SCIENCE IN NURSING EDUCATION AND  
7 ADMINISTRATION FROM THE UNIVERSITY OF CALIFORNIA, SAN ,  
8 FRANCISCO WHICH WAS AWARDED IN JANUARY OF 1979.

9 I AM CURRENTLY A PH.D CANDIDATE IN THE COLLEGE OF  
10 EDUCATION AT THE UNIVERSITY OF UTAH.

11 Q WOULD YOU GIVE US A BRIEF SUMMARY OF YOUR  
12 EMPLOYMENT BACKGROUND SINCE 1969?

13 A IMMEDIATELY AFTER GRADUATING FROM ST. JOHN'S  
14 COLLEGE I WORKED FOR SAINT JOSEPH'S RIVERSIDE HOSPITAL IN  
15 WARREN, OHIO, FOR ONE YEAR AS A STAFF NURSE. FROM THAT  
16 POSITION I LEFT IN JUNE OF 1970, WENT TO SAINT ELIZABETH'S  
17 HOSPITAL SCHOOL OF NURSING IN YOUNGSTOWN, OHIO, AND TAUGHT  
18 FOR TWO YEARS IN THE DEPARTMENT OF NURSING PROGRAM  
19 AFFILIATED WITH THAT HOSPITAL.

20 I TOOK 3 MONTHS OFF BETWEEN JUNE OF '72 AND  
21 SEPTEMBER OF '72 TO TAKE A VACATION AT WHICH TIME I APPLIED  
22 FOR A COMMISSION IN THE AIR FORCE AND WAS SO COMMISSIONED IN

1 OCTOBER OF 1972, BUT DID NOT GO ON ACTIVE DUTY UNTIL JANUARY  
2 OF '73. SO, IN THE MEANTIME I WORKED FOR 3 MONTHS AT THE  
3 FEDERAL-PSYCHIATRIC HOSPITAL HERE IN WASHINGTON, D. C.

4 Q IS THAT SAINT ELIZABETH'S?

5 A YES.

6 Q DID ANY OF YOUR TRAINING INCLUDE TRAINING IN  
7 PEDIATRICS?

8 A DURING YOUR UNDERGRADUATE TRAINING YOU ROTATE  
9 THROUGH ALL SPECIALTIES IN NURSING, AND PEDIATRICS WAS ONE  
10 SEMESTER OF COURSE WORK DURING THAT TIME. THEN I TOOK MY  
11 FIRST POSITION AT SAINT JOSEPH'S REVERSIDE HOSPITAL. IT WAS  
12 HOSPITAL POLICY THAT ALL NEW GRADUATE NURSES ROTATED THROUGH  
13 VARIOUS DEPARTMENTS AND I SPENT A MONTH OR SIX WEEKS WORKING  
14 IN PEDIATRICS THERE.

15 Q AFTER YOU JOINED THE AIR FORCE, WHAT ADDITIONAL  
16 TRAINING, IF ANY, DID YOU RECEIVE?

17 A IN TERMS OF FORMALIZED SCHOOLS, I ATTENDED THE  
18 FLIGHT NURSE COURSE AT THE SCHOOL OF AEROSPACE MEDICINE  
19 AT BROOKS AIR FORCE BASE IN SAN ANTONIO, TEXAS.

20 Q WHAT SORT OF COURSES WERE TAUGHT AT THE AEROSPACE  
21 MEDICINE SCHOOL AT BROOKS?

22 A A MAJOR EMPHASIS IN THAT COURSE IS ON ALTITUDE

1     PHYSIOLOGY AND HOW ALTITUDE PHYSIOLOGY RELATES TO THE CARE  
2     OF PATIENTS IN AN AIRCRAFT ENVIRONMENT.

3           --Q     WHAT EXACTLY IS ALTITUDE PHYSIOLOGY?--     --

4           A     I GUESS THE MOST SIMPLE WAY TO DEFINE IT WOULD BE  
5     TO SAY SIMPLY STUDYING WHAT HAPPENS TO THE BODY WHEN YOU ARE  
6     AT AN ALTITUDE HIGHER THAN SEA LEVEL OR SEVERAL HUNDRED FEET  
7     ABOVE SEA LEVEL.   SO, IT WOULD BE AIRCRAFT ENVIRONMENT AND  
8     THAT KIND OF THING.

9           Q     DID YOU RECEIVE ANY TRAINING IN SUCH SUBJECTS AS  
10    DECOMPRESSION, HYPOXIA AND EAR PROBLEMS?

11          A     YES.

12          Q     DID YOU ALSO RECEIVE ANY TRAINING IN WHAT IS  
13    CALLED AN ALTITUDE CHAMBER?

14          A     YES, WE DID.

15          Q     COULD YOU DESCRIBE THAT TRAINING FOR US, PLEASE?

16          A     OKAY.   AN ALTITUDE CHAMBER THAT THEY HAVE AT THE  
17    SCHOOL IS VERY MUCH LIKE A ROOM WITH PORTHOLES IN IT.   THEY  
18    TAKE YOU IN IN GROUPS, THE STUDENTS IN IN GROUPS, AND  
19    ACQUAINT US WITH THE VARIOUS KINDS OF OXYGEN EQUIPMENT THAT  
20    ARE USED IN AIRCRAFT AND HOW TO USE THEM:   THEY SHOW US BY  
21    DEMONSTRATIONS WHAT KINDS OF EFFECTS YOU CAN HAVE IF YOU ARE  
22    WITHOUT OXYGEN FOR ANY PERIOD OF TIME, THE EFFECT OF HYPOXIA

1 WHILE YOU ARE IN THE CHAMBER.

2 PART OF THE TRAINING IS TO EXPERIENCE HYPOXIA SO  
3 YOU KNOW WHAT YOUR SIGNS AND SYMPTOMS ARE BECAUSE THE  
4 SYMPTOMS OF HYPOXIA ARE VERY MUCH SUBJECTIVE AND VERY  
5 DIFFERENT FOR EACH INDIVIDUAL. THEY ALSO TAKE YOU THROUGH  
6 RAPID DECOMPRESSION.

7 Q YOU MENTIONED THEY TRAIN YOU TO IDENTIFY YOUR OWN  
8 SYMPTOMS OF HYPOXIA?

9 A RIGHT.

10 Q WHAT SYMPTOMS DID YOU EXPERIENCE DURING THE  
11 ALTITUDE CHAMBER TESTS?

12 A MY PERSONAL EXPERIENCE WITH HYPOXIA IS TUNNEL  
13 VISION. I LOSE ALL OF MY PERIPHERAL VISION.

14 Q YOU MENTIONED THAT THEY ALSO TRAIN YOU IN A RAPID  
15 DECOMPRESSION. CAN YOU DESCRIBE WHAT HAPPENS AT THE TIME OF  
16 A RAPID DECOMPRESSION?

17 A IN THE CHAMBER?

18 Q YES, IN THE CHAMBER.

19 A THEY TAKE YOU INTO A SMALLER CHAMBER FOR THAT  
20 EXPERIENCE, IN SMALLER GROUPS, ONLY 3 OR 4 STUDENTS INSTEAD  
21 OF 10 OR 12 AND LET YOU HOLD YOUR OXYGEN MASK THAT YOU ARE  
22 GOING TO USE AT THE TIME OF RAPID DECOMPRESSION AND THEY



1 TELL YOU WHAT ALTITUDES THEY ARE TAKING THAT ALTITUDE  
2 CHAMBER TO IN TERMS OF HOW THEY WERE, YOU KNOW, CLIMBING UP  
3 AS IF YOU WERE IN AN AIRCRAFT TO SIMULATE IT. AND, THEN AT  
4 SOME POINT, THE STUDENTS ARE NOT AWARE AT WHAT POINT THEY  
5 ARE GOING TO DO THIS, THEY DECOMPRESS THE CHAMBER AND YOU  
6 EXPERIENCE THE FOGGING AND THE COLD AND THE LOUD EXPLOSIVE  
7 SOUND OF THE DECOMPRESSION.

8 Q DID THERE COME A TIME WHEN YOU WERE ASSIGNED TO A  
9 C5A AIRCRAFT THAT WAS SENT ON A MISSION TO SAIGON, VIETNAM,  
10 ON OR ABOUT APRIL 4, 1975?

11 A YES, THERE DID.

12 Q COULD YOU TELL US THE CIRCUMSTANCES OF YOUR  
13 ASSIGNMENT TO THAT FLIGHT?

14 A MY FLYING ASSIGNMENT WAS WITH THE TENTH AERO-  
15 MEDICAL EVACUATION SQUADRON BASED AT TRAVIS AIR FORCE BASE  
16 IN CALIFORNIA. OUR USUAL MISSIONS WERE TO FLY BETWEEN  
17 TRAVIS AND CLARK VIA GAUM AND HAWAII, BRINGING PATIENTS BACK  
18 FROM THE ASIAN AREA WHO NEEDED TO BE HOSPITALIZED OR TREATED  
19 IN THE STATES.

20 I HAD FLOWN OVER ON A C141 CARGO PLANE THE  
21 PREVIOUS SUNDAY TO REPLACE ONE OF SEVERAL NURSES FROM THE  
22 NINTH AERO-MEDICAL EVACUATION SQUADRON THAT WAS STATIONED AT

1 CLARK THAT WAS GOING BACK TO THE STATES FOR SOME CROSS  
2 TRAINING IN OTHER AIRCRAFT. MY ORIGINAL MISSION OVER THERE  
3 WAS TO SPEND THE ENTIRE MONTH OF APRIL FLYING THE C9  
4 NIGHTINGALE AERO-MEDICAL EVACUATION PLANE AS OPPOSED TO MY  
5 USUAL AIRCRAFT, THE C41.

6 HOWEVER, WHEN WE GOT THERE WE WERE TOLD THAT  
7 SAIGON WAS IN BAD SHAPE AND VIETNAM WAS PRETTY SHAKEY AND WE  
8 WERE ALL PRETTY MUCH GOING ON A DAY-TO-DAY BASIS IN TERMS OF  
9 WHAT WE WERE GOING TO DO, AND I HAPPENED TO BE THE ALERT  
10 NURSE ON THE DAY OF THE THIRD.

11 WE START AN ALERT AT 8 A.M. IN THE MORNING AND  
12 WORK UNTIL 8 A.M. THE NEXT DAY. I WAS STILL ON MY ALERT  
13 DUTIES AT THE TIME ALL OF US FROM BOTH THE NINTH AND TENTH  
14 SQUADRONS WERE NOTIFIED THAT WE NEEDED TO REPORT TO THE  
15 SQUADRON READY TO FLY. WHEN WE GOT TO THE SQUADRON, WE WERE  
16 TOLD THAT WE WERE GOING TO GO INTO SAIGON, BUT IT WASN'T  
17 CLEAR HOW WE WERE GOING TO DO IT AND HOW THAT WAS GOING TO  
18 BE WORKED OUT WHEN WE FIRST ARRIVED. WE WERE JUST TO  
19 SIGN IN AND BE PRESENT SO THAT WHEN THEY MADE THAT DECISION,  
20 ALL THE FLIGHT CREWS OF BOTH SQUADRONS WOULD BE THERE AND  
21 READY.

22 Q YOU MENTIONED CLARK AIR FORCE BASE. IS THAT IN

1 THE PHILIPPINES?

2 A YES, IT IS.

3 Q WHEN DID YOU ACTUALLY FIND OUT WHAT YOUR MISSION  
4 TO SAIGON WAS GOING TO ENTAIL?

5 A WE DIDN'T ACTUALLY FIND OUT WHAT OUR MISSION TO  
6 SAIGON WAS GOING TO ENTAIL UNTIL WE GOT THERE. WE LEFT  
7 CLARK ON THE C5. WE WERE TOLD WE WERE TAKING A C5 AND THE  
8 CREW WAS TOLD WHO WAS GOING TO FLY WHAT POSITION. IN OTHER  
9 WORDS, I WAS TOLD I WAS TO BE MEDICAL CREW DIRECTOR. THEN  
10 LIEUTENANT WIRTZ, NOW CAPTAIN TATE, WAS TOLD SHE WOULD BE  
11 THE SECOND FLIGHT NURSE AND THE 3 MED TECHS THAT WENT ALONG  
12 WERE TOLD WHO WOULD BE THE CHARGE MED TECH AND THAT SORT OF  
13 THING.

14 Q YOU MENTIONED THAT YOU WERE THE MEDICAL CREW  
15 DIRECTOR. WHAT RESPONSIBILITIES DID THAT ENTAIL?

16 A THE MEDICAL CREW DIRECTOR ON AN AEROVAC FLIGHT --  
17 A MEDICAL CREW COMPLIMENT IS FIVE. IT IS TWO NURSES AND  
18 THREE MEDICAL TECHNICIANS. THE MEDICAL CREW DIRECTOR IS, IN  
19 A SENSE, THE HEAD NURSE OR THE NURSE IN CHARGE OF THE  
20 MEDICAL CREW WHO ASSIGNS DUTIES TO THE VARIOUS CREW MEMBERS  
21 AND ALSO OVERSEES THE CARE OF PATIENTS AND PASSENGERS IN  
22 FLIGHT.

1 Q YOU STATED THAT YOU WERE TOLD THE PURPOSE FOR YOUR  
2 MISSION AFTER YOU ARRIVED IN SAIGON. WHAT WERE YOU TOLD YOU  
3 WOULD BE DOING WITH REGARD TO YOUR RETURN FLIGHT?

4 A WE WERE TOLD THAT WE WOULD BE TAKING OUT CHILDREN.  
5 MOSTLY FROM THE ORPHANAGES THERE IN SAIGON, AND EVACUATING  
6 THEM BACK TO CLARK AND EVENTUALLY TO THE STATES AND ALSO  
7 SOME, I BELIEVE, DOD SECRETARIES, OR PEOPLE THAT WERE  
8 WORKING THERE, AMERICANS THAT WERE WORKING THERE THAT  
9 VOLUNTEERED TO ACCOMPANY THESE CHILDREN IN LEAVING THE  
10 COUNTRY.

11 Q WERE YOU INVOLVED IN ANY WAY IN THE LOADING OF THE  
12 ORPHANS ONBOARD THE AIRCRAFT?

13 A YES, I WAS.

14 Q WHO WAS IN CHARGE IN SEATING THE CHILDREN AND  
15 SETTING THE STANDARDS FOR THEIR SEATING ARRANGEMENT?

16 A I AM NOT SURE I UNDERSTAND WHAT YOU ARE ASKING ME

17 Q WHO WAS MAKING DECISIONS ABOUT HOW THE CHILDREN  
18 SHOULD BE SEATED AND WHERE THEY SHOULD BE LOCATED?

19 A WHEN CAPTAIN TATE AND I FOUND OUT ALONG WITH THE  
20 MED TECHS THAT WE WERE TAKING CHILDREN BACK, WE MADE THE  
21 DECISION JOINTLY IN A SENSE -- I MEAN, YOU KNOW, DISCUSSED  
22 IT AMONG US HOW WE WERE GOING TO MANAGE, WHEN WE FOUND OUT

1 HOW MANY CHILDREN WE WERE TAKING.

2 WE MADE THE DECISION TO PUT THE SMALLER CHILDREN  
3 UPSTAIRS IN THE TROOP COMPARTMENT BECAUSE IT WOULD BE MUCH  
4 EASIER TO SECURE THEM TO THE SEATS WITH THE SEAT BELTS AND  
5 LITTER STRAPS AND BLANKETS, AND THAT KIND OF THING. WHEN IT  
6 CAME TO THE ACTUAL ENPLANING, CAPTAIN TATE WAS UPSTAIRS  
7 WITH, I DON'T REMEMBER, ONE OR TWO OF THE MED TECHS AT THAT  
8 TIME AND I STAYED DOWNSTAIRS.

9 Q HOW WERE THE CHILDREN TO BE PLACED IN SEATS, HOW  
10 MANY PER SEAT, HOW WERE THEY RESTRAINED, THAT SORT OF THING?

11 A WITHIN THE TROOP COMPARTMENT OF THE C5A, THERE ARE  
12 ROWS OF 3 SEATS ON EACH SIDE OF THE AISLE. WHAT WE DID IS  
13 TOOK THE ARMRESTS OUT OF THE SEATS AND PUT TWO CHILDREN TO  
14 EACH SEAT SO THAT THERE WOULD BE 6 CHILDREN IN A ROW OF 3  
15 SEATS, SIMPLY BECAUSE THEY WERE SMALL AND THAT WAS THE BEST  
16 WAY WE FELT WE COULD SECURE THEM WITH THE SEAT BELTS PLUS  
17 THE LITTER STRAPS THAT WE DID HAVE. WE USED BLANKETS AND  
18 PILLOWS THAT WE ALSO CARRY TO PAD THEM, TO SECURE THEM.

19 Q DURING THE FLIGHT, DID HAVE YOU OCCASION TO  
20 OBSERVE THE SEATING ARRANGEMENT AND WHETHER OR NOT THE  
21 CHILDREN WERE STRAPPED IN?

22 A YES, DURING THE FLIGHT I DID.

1 Q DID THERE COME A TIME WHEN THE AIRCRAFT TOOK OFF  
2 FROM SAIGON?

3 A YES, IT DID.

4 Q DURING THE COURSE OF ITS FLIGHT, DID THERE COME  
5 A TIME WHEN THERE WAS A RAPID DECOMPRESSION?

6 A YES.

7 Q WHERE WERE YOU LOCATED AT THE TIME OF THE RAPID  
8 DECOMPRESSION?

9 A I WAS UPSTAIRS IN THE TROOP COMPARTMENT NEAR THE  
10 TAIL OF THE AIRCRAFT KNEELING ON THE GRATING BACK BY THE  
11 GALLEY AREA AND THE LOADMASTER'S SEAT.

12 Q WHAT, IF ANYTHING, DID YOU OBSERVE OR FEEL AT THE  
13 TIME OF THE RAPID DECOMPRESSION?

14 A THE EXPLOSIVE SOUND OF THE RAPID DECOMPRESSION.  
15 I, AND I AM SURE ALL OF THE OTHER CREW MEMBERS, IMMEDIATELY  
16 IDENTIFIED IT AS A RAPID DECOMPRESSION, HAVING GONE THROUGH  
17 ONE IN THE CHAMBER.

18 ALSO THERE WAS A MOMENTARY SENSATION OF FOGGINESS  
19 AND COLDNESS WITHIN THE AIRCRAFT.

20 Q ARE YOU ABLE TO COMPARE THIS EXPERIENCE TO THE  
21 TRAINING WHICH YOU HAD HAD IN THE ALTITUDE CHAMBER?

22 A IN TERMS OF A RAPID DECOMPRESSION, YES.

1 Q WAS IT SIMILAR?

2 A IT WAS PRACTICALLY IDENTICAL.

3 Q DID YOU EXPERIENCE ANY SENSATION OF ANY KIND IN  
4 YOUR EARS AT THE TIME OF THE DECOMPRESSION?

5 A NO.

6 Q AFTER THE RAPID DECOMPRESSION, WHAT DID YOU DO?

7 A I STOOD UP AND TURNED AROUND TO FACE THE FORWARD  
8 PART OF THE TROOP COMPARTMENT BECAUSE I WAS BACK NEAR THE  
9 TAIL OF THE AIRCRAFT. AT THAT TIME, I NOTICED THAT SERGEANT  
10 PERKINS WAS HANGING OVER THE GATE AT THE HEAD OF THE STAIRS  
11 WITHIN THE TROOP COMPARTMENT, THERE IS A GATE THAT IS KEPT  
12 CLOSED AND HE WAS HANGING ON THAT AND THE LADDER OR THE  
13 STEPS LEADING UP TO THE TROOP COMPARTMENT WERE TORN AWAY  
14 FROM HIM AND HE WAS HANGING OVER ON THE GATE AND ONE OF THE  
15 LOADMASTERS WAS ATTEMPTING TO PULL HIM UP AND ONE WAS  
16 ATTEMPTING TO PUT ON A WALK-AROUND O-2 BOTTLE.

17 SO, I PROCEEDED OVER THERE TO ASSIST THEM AND TO  
18 GET OXYGEN TO THEM. BY THE TIME WE GOT HIM UP ONTO THE  
19 FLOOR OF THE TROOP COMPARTMENT, I THEN WENT OVER TO THE  
20 FIRST ROW OF CHILDREN AND ATTEMPTED TO GIVE THEM OXYGEN AND  
21 ALSO PUT AN O-2 MASK ON MYSELF.

22 Q DURING THE PERIOD OF TIME WHEN YOU WERE HELPING TO

1 PULL THE SERGEANT UP THE LADDER AND HELPING TO GIVE THE  
2 OXYGEN TO THE OTHER CREW MEMBERS, DID YOU HAVE AN OXYGEN  
3 MASK ON YOURSELF?

4 A NOT AT THE TIME I WAS ASSISTING THEM, NO.

5 Q DO YOU HAVE ANY ESTIMATE AS TO APPROXIMATELY HOW  
6 MUCH TIME ELAPSED FROM THE TIME OF THE RAPID DECOMPRESSION  
7 UNTIL THE TIME YOU PUT YOUR OXYGEN MASK ON?

8 A THAT WOULD BE HARD TO SAY, BUT IT WAS PROBABLY A  
9 FEW MINUTES.

10 Q DURING THAT PERIOD OF TIME, DID YOU NOTE ANY  
11 SENSATIONS OR SYMPTOMS OF HYPOXIA IN YOURSELF?

12 A NO, NONE.

13 Q YOU STATED THAT YOU EVENTUALLY DID PUT AN OXYGEN  
14 MASK ON. WHAT WERE YOU DOING AT THAT TIME?

15 A THAT I PUT THE OXYGEN MASK ON?

16 Q YES.

17 A I HAD GONE OVER TO THE FIRST ROW OF CHILDREN THERE  
18 AND I SAT ON THE EDGE OF ONE OF THE SEATS WITH THE CHILDREN  
19 AND PUT THE O-2 MASK ON, BUT IT WAS ALMOST AT THAT MOMENT  
20 THAT THE ONE LOADMASTER WHO HAD BEEN ON THE HEADSET TOLD US  
21 THAT WE NO LONGER NEEDED THE OXYGEN.

22 Q DID YOU REMOVE YOUR MASK AT THAT TIME?



1 A WHEN HE TOLD US, YES.

2 Q AFTER YOU REMOVED YOUR MASK, DID YOU EVER HAVE  
3 -OCCASION TO PUT THE OXYGEN MASK BACK ON AGAIN?

4 A NO, I DID NOT.

5 MR. CONNORS: CAN WE GO OFF TAPE FOR A SECOND?

6 BY MR. CONNORS:

7 Q AFTER YOU REMOVED YOUR OXYGEN MASK, DID YOU  
8 NOTICE ANY EFFECTS OR SYMPTOMS IN YOURSELF OF HYPOXIA?

9 A NO, I DID NOT.

10 Q DURING THE PERIOD THAT YOU WERE HELPING TO PULL  
11 THE SERGEANT UP THE LADDER AND THEN ASSISTING THE OTHER MED  
12 TECHS AND THE CHILDREN, WERE YOU WORKING FAIRLY HARD AT THAT  
13 TIME?

14 A I GUESS YOU WOULD SAY YES, FAIRLY HARD, IN TERMS  
15 OF ENERGY EXPENDED.

16 Q NOW, AT THE TIME JUST PRIOR TO THE DECOMPRESSION,  
17 DID YOU HAVE AN OPPORTUNITY TO OBSERVE ANY OF THE SMALL  
18 CHILDREN IN THE AREA NEAR WHERE YOU WERE?

19 A YES, BECAUSE I HAD JUST COME UP THE LADDER AND,  
20 AS I CAME UP, I LOOKED OVER TOWARD THE TROOP COMPARTMENT  
21 WHERE ALL THE CHILDREN WERE SEATED BEFORE I WENT OVER TO THE  
22 GALLEY AREA.

1 Q COULD YOU DESCRIBE HOW THE CHILDREN LOOKED AT THAT  
2 TIME, PLEASE; THAT IS, JUST BEFORE THE RAPID DECOMPRESSION?

3 A A NUMBER OF THEM WERE SLEEPING; A FEW WERE AWAKE  
4 BUT MOST OF THEM WERE SLEEPING.

5 Q AFTER THE RAPID DECOMPRESSION, DID YOU HAVE AN  
6 OPPORTUNITY TO OBSERVE THESE CHILDREN AGAIN?

7 A YES.

8 Q AND, WHAT WAS THEIR CONDITION AFTER THE RAPID  
9 DECOMPRESSION?

10 A WELL, SOME OF THEM WERE STILL SLEEPING. A FEW OF  
11 THEM WERE FUSSING. THEY SEEMED TO BE ALL RIGHT -- IN MY,  
12 YOU KNOW, CURSORY ASSESSMENT THAT I MADE OF THEM.

13 Q IN THE COURSE OF YOUR TRAINING AT THE AEROSPACE  
14 MEDICINE SCHOOL AT BROOKS AIR FORCE BASE AND CONSIDERING  
15 YOUR EXPERIENCE AS A FLIGHT NURSE, WERE YOU TRAINED TO  
16 NOTICE OR OBSERVE ON PASSENGERS AND PATIENTS IN AN  
17 AIRPLANE THE SIGNS OF HYPOXIA?

18 MR. MCMANUS: I OBJECT TO THE QUESTION. YOU HAVE  
19 BEEN LEADING THIS WITNESS CONSISTENTLY. SO FAR, I HAVEN'T  
20 MADE ANY OBJECTIONS, BUT I AM GOING TO START MAKING SOME.

21 BY MR. CONNORS:

22 Q WHAT TRAINING, IF ANY, DID YOU RECEIVE AT THE

1 AEROSPACE MEDICINE SCHOOL AT BROOKS AIR FORCE BASE IN TERMS  
2 OF IDENTIFYING THE SYMPTOMS OF HYPOXIA IN PASSENGERS OR  
3 PATIENTS YOU MAY BE TREATING? --

4 MR. MCMAHON: SAME OBJECTION.

5 MR. CONNORS: I WAS REPEATING THE SAME QUESTION.

6 FOR YOUR INFORMATION, WE WILL TAKE THIS OUT LATER,  
7 THE BACK AND FORTH, UNTIL THE JUDGE RULES.

8 THE DEPONENT: OKAY.

9 MR. CONNORS: SO YOU'LL KNOW WHAT WE'RE DOING.

10 THE DEPONENT: I WAS A LITTLE UNSURE OF WHAT TO DO  
11 THERE.

12 BY MR. CONNORS:

13 Q WHAT TRAINING, IF ANY, DID YOU RECEIVE AT THE AERO-  
14 SPACE MEDICINE SCHOOL AT BROOKS AIR FORCE BASE IN TERMS OF  
15 OBSERVING OR RECOGNIZING THE SYMPTOMS OF HYPOXIA IN  
16 PASSENGERS OR PATIENTS WHO YOU MIGHT BE TREATING?

17 A A LOT OF OUR TRAINING ABOUT THE SYMPTOMS OF  
18 HYPOXIA WERE TO TRY TO OBSERVE THE PATIENT, BUT ALSO YOU  
19 NEED TO FIND OUT FROM THEM WHAT THEIR SYMPTOMS ARE BECAUSE  
20 THEY ARE SUBJECTIVE AND YOU NEED TO ASK. PEOPLE CAN  
21 EXPERIENCE DIZZINESS, HEADACHES, TUNNEL VISION, AS I DO.  
22 THE SYMPTOMS ARE VERY INDIVIDUALIZED. CYANOSIS IS ONE, BUT

1 IT IS REALLY A LATE SYMPTOM.

2 Q HOW DO YOU HANDLE A SYMPTOM WITH A CHILD WHO MAY  
3 NOT BE ABLE TO TELL YOU WHAT HIS SYMPTOMS ARE?

4 A THERE WOULDN'T BE REALLY ANY WAY THAT YOU COULD  
5 TELL UNLESS YOU OBSERVED THAT THEY WERE HAVING DIFFICULTIES  
6 BREATHING OR SOME SUCH THING OR THEY APPEARED TO BE IN SOME  
7 KIND OF DISTRESS.

8 Q ALL RIGHT. DID YOU OBSERVE ANY CHILDREN IN THE  
9 TROOP COMPARTMENT THAT APPEARED TO BE IN ANY KIND OF  
10 DISTRESS?

11 A NO, I DID NOT FROM WHERE I WAS.

12 Q DID YOU OBSERVE ANY OF THE CHILDREN AFTER THE  
13 RAPID DECOMPRESSION THAT APPEARED TO HAVE TURNED BLUE?

14 A NO.

15 Q YOU INDICATED THAT AFTER THE RAPID DECOMPRESSION  
16 YOU WERE HELPING TO TAKE CARE OF THE CHILDREN. WHAT EXACTLY  
17 WERE YOU DOING?

18 A RESECURING THEM, MAKING SURE THAT THE SEAT BELTS  
19 WERE STILL TIGHT, THE LITTER STRAPS WERE TIGHT. WE  
20 RESECURED SOME OF THE PILLOWS AND THE BLANKETS, REPOSITIONED  
21 THEM TO SEE THAT THEY WERE, YOU KNOW, STILL SECURE WITHIN  
22 THEIR SEATS.

1 Q DID YOU ATTEMPT TO GIVE ANY OF THE CHILDREN  
2 OXYGEN?

3 A THE ONLY TIME I ATTEMPTED WAS WHEN I FIRST WENT  
4 OVER TO THE SEAT AFTER WE HAD GOTTEN THE LOADMASTER UP ON  
5 THE FLOOR OF THE TROOP COMPARTMENT, BUT THE FIRST FEW  
6 INFANTS THAT I GAVE IT TO, IT WAS, YOU KNOW, A VERY SHORT  
7 TIME AFTER THAT THAT WE WERE TOLD THAT WE NO LONGER NEEDED  
8 IT.

9 Q YOU MENTIONED THAT YOUR INDIVIDUAL SYMPTOM OF  
10 HYPOXIA WAS TUNNEL VISION. DURING THE PERIOD AFTER THE  
11 RAPID DECOMPRESSION UNTIL THE AIRCRAFT CAME TO REST ON THE  
12 GROUND, AT ANY TIME DID YOU NOTICE THAT SYMPTOM IN YOURSELF?

13 A NO, I DID NOT.

14  
15 Q DID YOU NOTICE ANY OTHER SYMPTOMS OF HYPOXIA IN  
16 YOURSELF DURING THAT SAME PERIOD?

17 A NO.

18 Q NOW, DID THE AIRPLANE ULTIMATELY DESCEND TO A  
19 POINT WHERE A LANDING WAS IMMINENT?

20 A YES, IT DID.

21 Q AND, PRIOR TO THAT TIME, WHAT, IF ANY,  
22 INSTRUCTIONS OR NOTIFICATION HAD YOU RECEIVED ABOUT WHAT WAS

1 GOING TO HAPPEN?

2 A THE ONLY INSTRUCTION RECEIVED WAS THAT WE WOULD BE  
3 MAKING AN EMERGENCY LANDING BUT I THINK WE ALL REALIZED THAT  
4 WE WOULD BE MAKING AN EMERGENCY LANDING. THAT WAS THE ONLY  
5 INSTRUCTION AND AS FAR AS THE CREW MEMBERS, THE MEDICAL CREW  
6 MEMBERS FROM THE MEDICAL TROOP COMPARTMENT, WE PROCEEDED TO  
7 MAKE PREPARATION FOR THAT.

8 Q WHAT SORT OF PREPARATIONS DID YOU MAKE?

9 A DETERMINED WHICH MED TECHS WOULD GO OUT THE  
10 SLIDES, WHEN WE DID LAND AND THAT SORT OF THING, WHO WOULD  
11 DO WHAT.

12 AT THIS POINT I CAN'T REMEMBER WHICH PERSONS I  
13 ASSIGNED TO WHAT DUTIES, BUT WE DID DECIDE THAT, WHO WOULD GO  
14 OUT WHICH SLIDE AND WHO WOULD DO WHAT IN THE TROOP  
15 COMPARTMENT AT THE TIME OF THE LANDING.

16 Q WHAT, IF ANYTHING, DID YOU DO OR DIRECT BE DONE  
17 WITH REGARD TO THE CHILDREN AND THEIR PREPARATION FOR THE  
18 LANDING?

19 A AGAIN, IT WAS SIMPLY TO SEE THAT THEY WERE SECURE  
20 IN THEIR SEATS, AND REALLY WHEN WE SECURED THEM, THERE WAS  
21 NOT REALLY ANYTHING ELSE THAT WE COULD DO. THEY WERE PRETTY  
22 WELL PROTECTED BY THE SEAT BECAUSE THEY HAD THE SEAT BACKS

1 AND THE ENTIRE SEAT TO PROTECT THEIR BODIES, THEY WERE SO  
2 SMALL.

3 Q AT THE TIME OF THE LANDING OF THE AIRCRAFT, DID  
4 YOU HAVE A SEAT?

5 A NO, I DID NOT.

6 Q DID YOU HAVE A SEAT BELT OR ANY TYPE OF  
7 RESTRAINING DEVICE OF ANY KIND?

8 A NO, I DID NOT.

9 Q DID ANY OF THE ADULT MEMBERS OF THE CREW OR THE  
10 PERSONNEL ACCOMPANYING THE CHILDREN HAVE ANY SEATS IN THE  
11 TROOP COMPARTMENT?

12 A NO, THEY DID NOT.

13 Q WERE THE SEATS THAT THE CHILDREN WERE SEATED IN  
14 REARWARD FACING SEATS?

15 A YES, THEY WERE.

16 Q WHAT IS THE STANDARD METHOD OF SEATING PASSENGERS  
17 IN AIR FORCE AIRCRAFT, IF YOU KNOW?

18 A PASSENGERS MUST BE SEATED FACING THE REAR OF THE  
19 AIRCRAFT BY AIR FORCE REGULATIONS.

20 Q DO YOU KNOW THE REASON FOR THAT?

21 MR. MCMANUS: OBJECTION. I DON'T THINK SHE IS  
22 COMPETENT TO STATE THE REASON FOR THAT.

1 BY MR. CONNORS:

2 Q DO YOU KNOW THE REASON FOR THAT?

3 A YES, I DO. WE WERE TOLD AT THE FLIGHT SCHOOL THAT  
4 THAT IS A SAFETY FACTOR.

5 Q DID THERE COME A TIME WHEN THE AIRCRAFT -- STRIKE  
6 THAT.

7 YOU MENTIONED THAT THERE CAME A TIME WHEN YOU  
8 PREPARED FOR AN EMERGENCY LANDING. DID THERE COME A TIME  
9 WHEN A LANDING OR CONTACT WITH GROUND WAS MADE?

10 A YES.

11 Q DO YOU RECALL THAT?

12 A IN TERMS OF WHAT IT FELT LIKE OR WHAT HAD  
13 HAPPENED?

14 Q YES. WOULD YOU DESCRIBE FOR US WHAT THAT FIRST  
15 CONTACT FELT LIKE?

16 A IT JUST FELT LIKE A BUMPY LANDING. I DON'T KNOW  
17 HOW ELSE TO DESCRIBE IT. IT WAS JUST LIKE A BUMPY LANDING  
18 YOU COULD HAVE ANYWHERE.

19 Q APPROXIMATELY WHERE WERE YOU LOCATED AT THE TIME  
20 OF THE FIRST CONTACT WITH THE GROUND?

21 A I BELIEVE I WAS ABOUT MIDWAY IN THE TROOP  
22 COMPARTMENT SITTING ON THE FLOOR FACING FORWARD WITH MY LEGS



1   CROSSED IN A SARTORIAL FASHION, A TAILOR FASHION AND HOLDING  
2   ON TO THE LEGS OF THE SEATS.

3           Q     DO YOU RECALL HOW MANY IMPACTS THERE WERE WITH THE  
4   GROUND?

5           A     I BELIEVE THERE WERE TWO.  AFTER THE FIRST IMPACT,  
6   IT SEEMED THAT WE BECAME AIRBORNE AGAIN OR THAT SENSATION OF  
7   BEING AIRBORNE WAS WHAT I FELT.  AND, AS WE DID THAT, ONE OF  
8   THE MED TECHS WHO WAS FORWARD OF ME STOOD UP AND BEGAN TO  
9   WALK AROUND.  AND, AS HE DID THAT, I REACHED UP AND GRABBED  
10  HIM AND IT SEEMS THAT AT THE SAME TIME WE IMPACTED AGAIN.  
11  THAT IS WHEN I BEGAN TO SLIDE FORWARD AND LOST MY  
12  POSITIONING.

13          Q     YOU SAID YOU WERE SLIDING FORWARD.  COULD YOU  
14  DESCRIBE IN MORE DETAIL, PLEASE, EXACTLY WHAT YOU WERE  
15  EXPERIENCING AT THAT TIME?

16          A     WHEN I LET GO TO GRAB HIM BY THE ANKLE TO PULL HIM  
17  BACK DOWN AND TELL HIM TO GET DOWN, IT SEEMS LIKE -- THAT'S  
18  WHY I BELIEVE WE MUST HAVE HAD A SECOND IMPACT.  IT FELT  
19  LIKE THAT AT THAT TIME.  AND, THEN I STRAIGHTENED MY LEGS  
20  OUT AND I JUST SLID DOWN THE FLOOR OF THE TROOP COMPARTMENT  
21  TOWARD THE FORWARD SECTION OF THE TROOP COMPARTMENT.

22          Q     DURING THE PERIOD OF THE LANDING, DID YOU OBSERVE

1 ANY FLAMES, SMOKE OR FUMES IN THE TROOP COMPARTMENT?

2 A NO.

3 Q DID YOU OBSERVE ANY FLAMES, SMOKE OR FUMES AT ANY  
4 TIME IN THE TROOP COMPARTMENT AT THE TIME IT WAS ON GROUND  
5 OR THEREAFTER.

6 MR. MCMAHUS: I AM GOING TO OBJECT TO BOTH THOSE  
7 QUESTIONS. THEY'RE BOTH LEADING.

8 BY MR. CONNORS:

9 Q WHAT, IF ANYTHING, DID YOU OBSERVE ABOUT THE  
10 PRESENCE OF FIRE IN THE TROOP COMPARTMENT DURING THE LANDING  
11 SEQUENCE?

12 A THERE WAS NO FIRE IN THE TROOP COMPARTMENT.

13 Q WHAT, IF ANYTHING, DID YOU OBSERVE ABOUT SMOKE OR  
14 FUMES IN THE TROOP COMPARTMENT DURING THE LANDING SEQUENCE?

15 A THERE WAS NO SMOKE OR FIRE.

16 Q WERE THERE ANY FUMES?

17 A NO.

18 Q YOU MENTIONED THAT YOU WERE SLIDING FORWARD. WERE  
19 YOU INJURED IN ANY WAY?

20 A I SUSTAINED INJURIES IN THE CRASH, BUT I DON'T  
21 KNOW AT WHAT POINT IN TIME I SUSTAINED THEM. I SUSPECT SOME  
22 OF THEM WERE AS I WAS SLIDING FORWARD.

1 Q WOULD YOU DESCRIBE THE INJURIES WHICH YOU  
2 SUFFERED, PLEASE?

3 A I HAD NUMEROUS CUTS AND BRUISES. I HAD A  
4 COMPRESSION FRACTURE OF L-3, LUMBAR VERTEBRA. I HAD FOUR  
5 BROKEN BONES IN MY FOOT AND A DEEP LEG LACERATION IN MY  
6 RIGHT LEG, A HAND LACERATION IN MY LEFT HAND AND A PUNCTURE  
7 WOUND OR A LACERATION IN MY LEFT ELBOW.

8 Q DID THERE COME A TIME WHEN THE TROOP COMPARTMENT  
9 BECAME STABLE AND STOPPED?

10 A YES.

11 Q WHAT DID YOU DO AFTER THAT?

12 A AFTER THE TROOP COMPARTMENT HAD STOPPED AND WAS NO  
13 LONGER MOVING, I STOOD UP FROM WHERE I WAS AND WALKED BACK  
14 THE LENGTH OF THE TROOP COMPARTMENT TO TAKE REALLY A CURSORY  
15 AND KIND OF A QUICK ASSESSMENT OF THE CHILDREN IN THE  
16 SEATS.

17 Q AFTER THAT, DID YOU ASSIST IN THE THE EVACUATION  
18 OF THOSE CHILDREN?

19 A YES, I DID.

20 Q WHAT DID YOU OBSERVE WITH RESPECT TO THE CHILDREN  
21 IN THE TROOP COMPARTMENT AFTER THE AIRCRAFT CAME TO A STOP?

22 A IN GENERAL THEY SEEMED TO BE ALL RIGHT. SOME OF

1 THEM WERE CRYING, SOME WERE EVEN STILL SLEEPING, BUT THEY  
2 SEEMED TO BE OKAY.

3 Q DID THERE COME A TIME WHEN THE CHILDREN WERE  
4 EVACUATED FROM THE AIRCRAFT?

5 A YES.

6 Q AND, WHAT DID YOU DO DURING THAT PERIOD?

7 A I ASSISTED IN EVACUATING THE CHILDREN BOTH FROM  
8 THE AIRCRAFT AND GETTING THEM TO THE RESCUE HELICOPTERS THAT  
9 CAME IN TO PICK THEM UP.

10 Q WHAT, IF ANYTHING, DID YOU OBSERVE ABOUT THE  
11 CONDITION OF THE CHILDREN WHICH YOU WERE HELPING TO  
12 EVACUATE?

13 A THE ONES THAT I WAS HELPING TO EVACUATE SEEMED  
14 OKAY. AS I SAID, THEY WERE FUSSY, BUT THEY WERE OKAY.

15 Q DO YOU HAVE ANY ESTIMATE OF HOW LONG IT TOOK TO  
16 EVACUATE THE CHILDREN FROM THE TROOP COMPARTMENT?

17 A YOU MEAN TO COMPLETE THE ENTIRE EVACUATION?

18 Q YES.

19 A NO, I DO NOT.

20 Q AT SOME POINT DID YOU LEAVE THE TROOP  
21 COMPARTMENT?

22 A YES, I DID.

1 Q AND, WHAT DID YOU DO AT THAT TIME?

2 A WELL, THE FIRST TIME I LEFT THE TROOP COMPARTMENT,  
3 IT WAS TO, IN A SENSE, GET OUR BEARINGS AS TO WHERE WE WERE  
4 AND SEE WHAT THE SITUATION WAS. IT WAS KIND OF AN OUTSIDE  
5 ASSESSMENT, IF YOU WILL. AND, THEN WHEN I STEPPED OUT, I  
6 SAW THE FLIGHT DECK OFF TO MY LEFT AND IT WAS UPSIDE DOWN  
7 AND AT FIRST I DIDN'T SEE ANYONE GETTING OUT OF THAT. AND,  
8 THEN WITHIN A VERY SHORT PERIOD OF TIME, JUST A FEW MINUTES,  
9 MAYBE EVEN A FEW SECONDS, THE CREW MEMBERS STARTED COMING  
10 OUT AND COMING OVER TO HELP US AND ABOUT THE SAME TIME WE  
11 HEARD THE HELICOPTERS COMING IN.

12 Q WHAT, IF ANYTHING, DID YOU DO THEN?

13 A WHEN WE SAW THE HELICOPTERS COMING IN?

14 Q YES.

15 A WE BEGAN TO GATHER UP THE CHILDREN AND TAKE THEM  
16 TO THE HELICOPTERS AS THEY CAME IN TO RESCUE THEM.

17 Q CAN YOU GIVE US ANY ESTIMATE OF TIME IN TERMS OF  
18 HOW LONG IT WAS BETWEEN THE TIME THE TROOP COMPARTMENT  
19 STOPPED AND THE HELICOPTERS ARRIVED?

20 A IT WAS PROBABLY NOT MORE THAN 5 MINUTES, MAYBE 10;  
21 BUT AT THE MOST PROBABLY 5.

22 Q WHERE DID THE HELICOPTERS TAKE THE CHILDREN, IF

1 YOU KNOW?

2 A MOST OF THEM TOOK THEM TO THE SEVENTH DAY  
3 ADVENTIST HOSPITAL IN SAIGON.

4 Q WHAT, IF ANYTHING, DID YOU OBSERVE ABOUT THE  
5 PRESENCE OF FIRE IN OR AROUND THE TROOP COMPARTMENT AFTER IT  
6 CAME TO REST?

7 A THERE WAS NONE AROUND THE TROOP COMPARTMENT AFTER  
8 WE HAD STOPPED.

9 Q WHAT, IF ANYTHING, DID YOU OBSERVE ABOUT FIRE OR  
10 SMOKE IN THE ACCIDENT AREA?

11 A FORWARD OF US I COULD SEE THE ENGINES THAT WERE ON  
12 FIRE AND SMOKING, BUT THEY WERE A GOOD DISTANCE AWAY FROM US  
13 AND I KNEW THEY WERE OF NO DANGER TO US BECAUSE OF WHERE  
14 THEY WERE.

15 Q WHAT, IF ANYTHING, DID YOU OBSERVE WITH REGARD TO  
16 SMOKE OR UNUSUAL ODORS IN THE VICINITY OF THE TROOP  
17 COMPARTMENT AFTER IT CAME TO REST?

18 A I DIDN'T NOTICE ANY UNUSUAL ODORS NOR WAS THERE  
19 ANY SMOKE.

20 MR. CONNORS: OFF TAPE, PLEASE.

21 WE ARE BACK ON TAPE AT THIS TIME.

22 BY MR. CONNORS:

1 Q MRS. AUNE, I WOULD LIKE TO SHOW YOU DEFENDANT'S  
2 EXHIBIT D-1217 AND ASK IF YOU CAN IDENTIFY THE SCHEMATIC AT  
3 THE BOTTOM HALF OF THAT EXHIBIT?

4 A YES.

5 Q AND, WHAT IS THAT?

6 A IT IS THE C5 AIRCRAFT.

7 Q WOULD YOU POINT TOWARDS THE FRONT OF THE AIRCRAFT,  
8 PLEASE, AND TOWARDS THE REAR?

9 A (WITNESS COMPLIES.)

10 Q WOULD YOU POINT OUT FOR US, PLEASE, WHERE THE  
11 TROOP COMPARTMENT IS LOCATED ON THAT DIAGRAM?

12 A IT IS UP HERE.

13 Q DURING THE LOADING OPERATION OF THE CHILDREN,  
14 WHERE WERE YOU LOCATED?

15 A I WAS DOWN HERE AT THE LADDER.

16 Q WHAT IF -- STRIKE THAT. ARE THERE ANY OTHER  
17 ENTRANCES FROM THE LOWER PORTION OF THE AIRCRAFT TO THE  
18 TROOP COMPARTMENT?

19 A NO.

20 Q HOW WERE THE CHILDREN BEING PASSED UP THE LADDER?

21 A THERE WERE CREW MEMBERS LINING THE WHOLE LADDER.  
22 ONE CREW MEMBER STOOD AT THE DOORWAY HERE WHERE THEY ENTERED

1 AND WE JUST HANDED THEM BY HAND UP THE LADDER. THEY WERE  
2 TOO SMALL TO WALK UP, AND IT IS A VERY STEEP LADDER, SO ONE  
3 CREW MEMBER WOULD HAND THEM TO THE NEXT CREW MEMBER AND JUST  
4 PASS THEM UP THE LADDER.

5 MR. CONNORS: THANK YOU. OFF TAPE, PLEASE.

6 BY MR. CONNORS:

7 Q WE ARE NOW BACK ON TAPE.

8 MRS. AUNE, I WOULD NOW LIKE TO SHOW YOU  
9 DEFENDANT'S EXHIBIT D-1210 AND ASK IF YOU CAN IDENTIFY THAT  
10 FOR US, PLEASE?

11 A YES, IT IS THE TROOP COMPARTMENT.

12 Q WOULD YOU SHOW US, PLEASE, WHERE YOU WERE LOCATED  
13 AT THE TIME OF THE RAPID DECOMPRESSION?

14 A ON THE BACK GRATING.

15 Q AND, WHAT WERE YOU DOING AT THAT POINT?

16 A I WAS GETTING SOME MEDICATIONS OUT OF OUR NARCOTIC  
17 KIT WHICH WE HAD STOWED BEHIND THIS LOADMASTER'S SEAT. SO,  
18 I WAS KNEELING ON THAT AND GETTING MEDICATION OUT OF THE  
19 KIT.

20 Q WOULD YOU ALSO POINT OUT FOR US, PLEASE, WHERE YOU  
21 WERE DURING THE PERIOD AFTER THE RAPID DECOMPRESSION?

22 A I MOVED OVER HERE. THERE IS A GATE HERE AT THE



1 HEAD OF THE STAIRWAY FOR THE STAIRS LEADING UP TO THE TROOP  
2 COMPARTMENT. THIS IS WHERE SGT. PERKINS WAS HANGING, AND I,  
3 EVENTUALLY, AFTER WE GOT HIM SETTLED, MOVED OVER TO THIS  
4 ROW, ONE OF THESE SEATS IN THIS ROW WITH THE INFANTS IN THE  
5 SEATS.

6 Q WOULD YOU POINT OUT FOR US, PLEASE, WHERE YOU WERE  
7 LOCATED AT THE TIME OF THE FIRST IMPACT WITH THE GROUND.

8 A I WAS PROBABLY SOMEWHERE AROUND IN THIS AREA, ONE  
9 OF THESE ROWS OF SEATS, SITTING ON THE FLOOR, IN PROBABLY  
10 THIS POSITION HERE.

11 Q WHICH DIRECTION IN THAT DIAGRAM IS THE FRONT OF  
12 THE AIRPLANE?

13 A THIS IS TOWARD THE FRONT, DOWN AT THAT END.

14 Q AND, WHICH DIRECTION WERE YOU FACING WHEN YOU WERE  
15 SEATED ON THE FLOOR?

16 A I WAS FACING FRONT.

17 Q YOU INDICATED THAT AT THE TIME OF THE SECOND  
18 IMPACT, YOU SLID FORWARD. COULD YOU POINT OUT FOR US  
19 APPROXIMATELY WHERE YOU WERE LOCATED, WHEN YOU FINISHED  
20 SLIDING FORWARD, IF YOU CAN?

21 A I CAN. I JUST HAVE TO GET THAT FAR. DOWN HERE.

22 MR. CONNORS: OKAY. THANK YOU VERY MUCH.

1 OFF TAPE, PLEASE.

2 WE ARE BACK ON TAPE NOW.

3 BY CONNORS:

4 Q MRS. AUNE, I WOULD LIKE TO SHOW YOU DEFENDANT'S  
5 EXHIBIT D-1382, A COLOR SLIDE, AND ASK IF YOU CAN IDENTIFY  
6 WHAT IS SHOWN IN THAT SLIDE?

7 A THAT IS THE TROOP COMPARTMENT OF THE AIRCRAFT AS  
8 VIEWED FROM THE OUTSIDE.

9 Q COULD YOU SHOW US, PLEASE, APPROXIMATELY WHERE YOU  
10 WERE, WHEN THE CHILDREN WERE BEING TAKEN OUTSIDE THE TROOP  
11 COMPARTMENT?

12 A IN THIS AREA IN HERE.

13 Q AND, WHAT WERE YOU DOING AT THAT POINT?

14 A WHEN WE TOOK THE CHILDREN OUTSIDE, WE WERE TAKING  
15 THEM TO THE HELICOPTERS, WHICH WERE A DISTANCE FROM THE  
16 TROOP COMPARTMENT.

17 Q IN WHICH DIRECTION WERE YOU TAKING THEM?

18 A TO THE HELICOPTERS?

19 Q YES.

20 A WELL, WE HAD TO WALK BACKWARDS, BECAUSE THE  
21 HELICOPTERS HAD TO HOVER; THEY COULDN'T LAND. AND, THE  
22 ROTOR BLADES OF THE HELICOPTERS WERE THROWING UP, YOU KNOW,

1 DEBRIS FROM THE ROTOR WASH. AND, SO WE HAD TO WALK  
2 BACKWARDS UNTIL THE LAST MINUTE, THEN TURN AROUND AND PUT  
3 THE CHILDREN IN THE HELICOPTER.

4 Q COULD YOU DESCRIBE FOR US THE TERRAIN IMMEDIATELY  
5 OUTSIDE THE TROOP COMPARTMENT WHERE YOU WERE?

6 A IT WAS PRETTY MARSHY AND MUDDY. AND, SO,  
7 DEPENDING ON HOW TALL YOU WERE, YOU WERE EITHER SANK UP TO  
8 YOUR KNEES OR ALMOST UP TO YOUR WAIST IN MUD.

9 MR. CONNORS: OKAY. OFF TAPE, PLEASE.

10 WE ARE BACK ON TAPE.

11 BY MR. CONNORS:

12 Q MRS. AUNE, I'D LIKE TO SHOW YOU DEFENDANT'S  
13 EXHIBIT D-1382, AN 8 BY 10 COLOR PHOTOGRAPH, AND ASK IF YOU  
14 CAN IDENTIFY THE SCENE THAT'S DEPICTED IN THAT PICTURE?

15 A THAT'S THE TROOP COMPARTMENT OF THE AIRCRAFT FROM  
16 THE OUTSIDE.

17 Q WOULD YOU POINT OUT FOR US, PLEASE, WHERE YOU  
18 WERE, WHEN THE CHILDREN WERE BEING REMOVED FROM THE TROOP  
19 COMPARTMENT?

20 A THIS AREA.

21 Q AND, WHAT WERE YOU DOING IN REGARD TO REMOVING THE  
22 CHILDREN OR EVACUATING THE CHILDREN FROM THE TROOP

1 COMPARTMENT?

2 A WE WERE CARRYING THEM TO THE HELICOPTERS.

3 Q AND, WOULD YOU ~~DESCRIBE~~ THAT PROCESS FOR US,  
4 PLEASE?

5 A THE HELICOPTERS COULD NOT LAND AND IN ORDER TO GET  
6 THE CHILDREN TO THE HELICOPTERS WITHOUT HAVING ALL THE ROTOR  
7 WASH FROM THE HELICOPTER ROTOR BLADES BLOWING IN OUR FACES,  
8 WE WALKED BACKWARDS CARRYING THE CHILDREN TO THE HELICOPTERS  
9 AND THEN PUT THEM ON THE FLOOR OF THE HELICOPTER.

10 Q COULD YOU DESCRIBE FOR US, PLEASE, THE TERRAIN  
11 IMMEDIATELY SURROUNDING THE TROOP COMPARTMENT?

12 A IT WAS MUDDY OR MARSHY. AND, WHEN YOU STEPPED  
13 INTO IT, DEPENDING ON HOW TALL YOU WERE, YOU WERE EITHER UP  
14 TO YOUR KNEES IN MUD OR YOU WERE ALMOST UP TO YOUR WAIST IN  
15 MUD.

16 MR. CONNORS: OFF TAPE, PLEASE.

17 WE ARE BACK ON TAPE AT THIS TIME.

18 BY MR. CONNORS:

19 Q MRS. AUNE, I'VE JUST HANDED YOU A SMALL COPY OF  
20 DEFENDANT'S EXHIBIT D-1210 WHICH YOU HAVE ALREADY  
21 DISCUSSED. WOULD YOU PLEASE SHOW IT TO THE CAMERA, PLEASE,  
22 FOR IDENTIFICATION?

1 A (WITNESS COMPLIES.)

2 Q ALL RIGHT. NOW, YOU'VE PREVIOUSLY IDENTIFIED THAT  
3 AS A ~~DEFICTION~~ OF THE TROOP COMPARTMENT AND YOU SHOWED US  
4 WHERE YOU WERE LOCATED. SO THAT WE CAN HAVE A PERMANENT  
5 RECORD, I AM GOING TO ASK IF YOU WOULD FIRST PUT AN "X" AND  
6 IDENTIFY THE SPOT WHERE YOU WERE LOCATED AT THE TIME OF THE  
7 RAPID DECOMPRESSION?

8 A (WITNESS COMPLIES.)

9 Q AND, IF YOU WOULD JUST DRAW A LINE OUT TO THE  
10 CLEAR PORTION OF THE PAPER AND WRITE AN IDENTIFYING  
11 STATEMENT AS TO THAT EFFECT, PLEASE?

12 A (WITNESS COMPLIES.)

13 Q OKAY. AND, WHAT HAVE YOU WRITTEN, PLEASE?

14 A LOCATION AT THE TIME OF THE RD.

15 Q WOULD YOU NEXT POINT OUT FOR US, PLEASE, AND  
16 IDENTIFY WITH AN "X" THE LOCATION OF WHERE YOU WERE WHEN YOU  
17 ASSISTED THE CREW MEMBER UP THE LADDER, AND IF YOU WOULD,  
18 YOU DRAW A LINE OUT AND IDENTIFY THAT IN SOME WAY, PLEASE?

19 A (WITNESS COMPLIES.)

20 Q AND WOULD YOU NEXT IDENTIFY THE LOCATION OF WHERE  
21 YOU WENT TO AFTER HELPING THE CREW MEMBER, WHEN YOU  
22 INDICATED YOU WERE ASSISTING THE CHILDREN.

1 A (WITNESS COMPLIES. )

2 Q AND WHAT HAVE YOU IDENTIFY THAT AS?

3 A ASSISTING CHILDREN.

4 Q WOULD YOU NOW PUT AN "X" AND IDENTIFY THE SPOT

5 WHERE YOU WERE AT THE TIME OF THE FIRST IMPACT?

6 A (WITNESS COMPLIES. )

7 Q AND, HOW HAVE YOU IDENTIFIED THAT?

8 A JUST LOCATION AT THE TIME OF THE FIRST IMPACT.

9 Q OKAY. AND, WOULD YOU NOW PUT AN "X" TO IDENTIFY

10 THE LOCATION WHERE YOU WERE AFTER THE TROOP COMPARTMENT CAME  
11 TO REST?

12 A (WITNESS COMPLIES. )

13 Q AND, WHAT HAVE YOU WRITTEN THERE?

14 A LOCATION AT TIME TROOP COMPARTMENT STOPPED MOVING.

15 Q WOULD YOU SHOW THAT DOCUMENT TO THE CAMERA,

16 PLEASE?

17 A (WITNESS COMPLIES. )

18 Q I WILL ASK THAT THAT DOCUMENT BE IDENTIFIED AS

19 DEFENDANT'S EXHIBIT D-1210-AUNE.

20 [DEFENDANT'S EXHIBIT D-1210-AUNE WAS

21 MARKED FOR IDENTIFICATION. ]

22 BY MR. CONNORS:

1 Q MRS. AUNE, WOULD YOU JUST PLEASE SIGN THAT AT THE  
2 BOTTOM, PLEASE?

3 A (WITNESS COMPLIES.)

4 MR. CONNORS: FINE. THANK YOU VERY MUCH. I HAVE  
5 NO MORE QUESTIONS AT THIS TIME.

6 CROSS EXAMINATION

7 BY MR. MCMANUS:

8 Q MRS. AUNE, YOU HAVE NEXT TO YOU DEFENDANT'S  
9 EXHIBIT D-1382? DO YOU KNOW WHEN THAT PICTURE WAS TAKEN,  
10 MA'AM?

11 A NO, I DO NOT.

12 Q DO YOU SEE WHAT APPEARS TO BE WATER ALL AROUND THE  
13 BASE EDGES OF THE TROOP COMPARTMENT?

14 A DO YOU MEAN THIS AREA HERE?

15 Q YES, MA'AM, THE BLUE AREAS.

16 A YES.

17 Q WAS THAT WATER PRESENT ON THE DAY OF THE CRASH?

18 A I DON'T REMEMBER. I REMEMBER IT JUST BEING MARSHY  
19 AND MUDDY THERE AT THE TIME OF THE CRASH.

20 Q COULD YOU PUT UP THE NEXT PHOTOGRAPH, PLEASE, AND  
21 THAT'S DEFENDANT'S EXHIBIT D-1427.

22 CAN YOU IDENTIFY ANY PORTIONS OF THE AIRCRAFT IN

1 THAT PHOTOGRAPH?

2 A THIS PORTION IS THE FLIGHT DECK, AND THE PORTION  
3 IN THE BACKGROUND ~~IS~~ THE TROOP COMPARTMENT.

4 Q AND, IS THE FLIGHT DECK UPSIDE DOWN IN THAT PHOTO?

5 A YES, IT IS.

6 Q AND, IS THAT HOW YOU SAW IT WHEN YOU STEPPED OUT  
7 OF THE TROOP COMPARTMENT IMMEDIATELY AFTER THE CRASH?

8 A I SAW IT UPSIDE DOWN, BUT I WAS OVER HERE VIEWING  
9 IT FROM THIS PERSPECTIVE AND NOT FROM THE PERSPECTIVE THAT  
10 IT IS IN THE PICTURE.

11 MR. MCMANUS: THANK YOU, MRS. AUNE. OFF TAPE.

12 I HAVE NO FURTHER USE FOR THE PICTURE. THEY CAN  
13 BE TAKEN OUT OF THE WAY.

14 BY MR. MCMANUS:

15 Q MRS. AUNE, YOU MENTIONED IN RESPONSE TO MR.  
16 CONNOR'S QUESTIONS THAT YOU HAD UNDERGONE SOME ALTITUDE  
17 CHAMBER TESTING; IS THAT CORRECT, MA'AM?

18 A YES, IT IS.

19 Q ALL OF THAT TESTING WAS DONE ON THE GROUND; ISN'T  
20 THAT CORRECT?

21 A YES, IN THE ALTITUDE CHAMBER.

22 Q SO, YOU WERE NEVER TAKEN UP IN AN AIRPLANE AND



1 THEN DECOMPRESSED WHILE THE AIRPLANE WAS IN THE SKY?

2 A NO.

3 Q AND THE COURSE THAT YOU MENTIONED BEFORE WAS A  
4 FIVE-WEEK COURSE; ISN'T THAT CORRECT?

5 A YES, IT WAS.

6 Q AND THE ALTITUDE PHYSIOLOGY PORTION OF THAT COURSE  
7 WAS TWO AND A HALF WEEKS; IS THAT CORRECT?

8 A YES.

9 Q NOW, YOU WERE STUNNED AS A RESULT OF THE IMPACT AT  
10 THE CRASH LANDING; ISN'T THAT CORRECT?

11 A WHAT DO YOU MEAN BY STUNNED?

12 Q YOU PARTIALLY LOST CONSCIOUSNESS OR FULLY LOST  
13 CONSCIOUSNESS?

14 A NOT AT THE TIME OF IMPACT, NO.

15 Q YOU DID NOT LOSE CONSCIOUSNESS AFTER YOU GOT OUT  
16 OF THE TROOP COMPARTMENT; ISN'T THAT CORRECT?

17 A LATER ON, AFTER WE HAD BEGUN THE EVACUATION OF THE  
18 CHILDREN. IT WAS WELL INTO THE EVACUATION OF THE CHILDREN.

19 Q THIS WAS A VIOLENT AIRPLANE CRASH, WASN'T IT,  
20 MA'AM?

21 A I WOULD NOT TERM IT THAT WAY.

22 Q NOW, I BELIEVE YOU SAID YOU WERE ALERTED TO THE

1 POSSIBILITY OF THIS MISSION EARLY IN THE MORNING ON APRIL  
2 THE 4TH?

3 A YES.                     

4 Q DO YOU RECALL WHO WAS TOLD WOULD BE THE CREW  
5 ACCOMPANYING YOU TO SAIGON?

6 A I AM NOT SURE I UNDERSTAND WHAT CREW YOU'RE  
7 TALKING ABOUT?

8 Q THE MEDICAL CREW THAT WAS GOING WITH YOU.

9 A THE CHIEF NURSE TOLD THE FIVE OF US THAT WE WERE  
10 GOING TO BE THE MEDICAL CREW, WHO THAT WOULD BE.

11 Q AND, WHO WERE THE OTHER MEMBERS OF THE MEDICAL  
12 CREW?

13 A LIEUTENANT WIRTZ, WHO IS NOW CAPTAIN TATE, WAS THE  
14 SECOND FLIGHT NURSE. SERGEANT WISE WAS THE SENIOR MED TECH,  
15 AND SERGEANT GMEREK AND SERGEANT HADLEY WERE THE OTHER TWO  
16 MED TECHS.

17 Q AND, DID YOU CONSIDER THE MED TECHS THAT WERE  
18 GOING TO ACCOMPANY YOU TO BE HIGHLY TRAINED MEDICAL  
19 PERSONNEL.

20 A YES. THEY HAVE TO GO THROUGH A COURSE AT FLIGHT  
21 SCHOOL, TOO.

22 Q AND, WHO WAS DESIGNED AS THE MEDICAL CREW

1 DIRECTOR?

2 A I WAS.

3 Q HAD YOU EVER BEEN A MEMBER OF A MEDICAL CREW ON A  
4 CSA BEFORE?

5 A NO.

6 Q HOW MANY TIMES HAD YOU EVER BEEN ON A CSA?

7 A ONCE PRIOR TO THAT.

8 Q AND HOW MANY TIMES SINCE THEN?

9 A NEVER.

10 Q DO YOU KNOW HAD CAPTAIN TRAYNOR, THE AIRCRAFT  
11 COMMANDER, EVER FLOWN AN AIR EVAC MISSION BEFORE?

12 A HE HAD TOLD US AT THE BRIEFING HE HAD NOT.

13 Q NOW, YOUR FLIGHT ORIGINATED AT CLARK AIR FORCE  
14 BASE; IS THAT CORRECT?

15 A THAT'S CORRECT.

16 Q AND, THAT'S IN THE PHILIPPINES?

17 A THAT IS CORRECT.

18 Q AND, DO I UNDERSTAND THAT YOU DID NOT KNOW WHAT  
19 YOUR MISSION WAS GOING TO BE UNTIL YOU GOT TO SAIGON?

20 A THAT'S CORRECT.

21 Q AND, WHEN YOU GOT TO SAIGON, WHAT WERE YOU TOLD?

22 A WE WERE TOLD THAT WE WOULD BE TAKING CHILDREN,

1 ORPHANS, CHILDREN FROM THE ORPHANAGES THERE OUT OF SAIGON TO  
2 CLARK EN ROUTE TO THE UNITED STATES.

3 Q AND, WHO ADVISED YOU OF THIS?

4 A AN AIR FORCE COLONEL WHO CAME ABOARD THE AIRCRAFT  
5 AFTER WE HAD LANDED IN SAIGON AND HAD PARKED THE AIRCRAFT.  
6 I DON'T KNOW HIS NAME.

7 Q HOW LONG WERE YOU ON THE GROUND BEFORE THE  
8 CHILDREN WERE BEGUN TO BE LOADED ON TO THE PLANE?

9 A NOT VERY LONG, BUT I AM NOT SURE WHAT THE TIME-  
10 FRAME WAS.

11 Q DO YOU RECALL WHERE YOU WERE DURING THAT PERIOD OF  
12 TIME, THAT INTERVAL?

13 A THAT WE WERE JUST STAYING ON THE PLANE?

14 Q YES, MA'AM.

15 A YES, WE WERE ON THE FLIGHT DECK. ALL THE MED CREW  
16 WAS ON THE FLIGHT DECK.

17 Q AND, TO YOUR KNOWLEDGE, HAD A C5 EVER BEEN USED  
18 FOR AN AIR EVACUATION PRIOR TO THIS MISSION ?

19 A NOT TO MY KNOWLEDGE.

20 Q AND, WERE YOU TOLD ANYTHING ABOUT THE AGE OF THE  
21 CHILDREN THAT YOU WERE GOING TO BE EVACUATING?

22 A WHEN I ASKED THE AIR FORCE COLONEL WHO CAME OUT TO

1 THE PLANE ABOUT THE CHILDREN, HE SAID THAT THEY WERE  
2 APPROXIMATELY, THAT IS, A LARGE GROUP OF THEM, APPROXIMATELY  
3 WERE TWO YEARS OLD BUT THAT THERE WERE SOME OLDER CHILDREN  
4 ALSO THAT WERE PROBABLY FIVE, SIX, SEVEN, EIGHT, MAYBE  
5 NINE.

6 Q WHAT WAS THE CONDITION OF THE CHILDREN AS THEY  
7 WERE LOADED ABOARD THE C5?

8 A MOST OF THEM SEEMED TO APPEAR HEALTHY BUT THAT,  
9 YOU KNOW, IS JUST A CURSORY ASSESSMENT THAT YOU MAKE AS YOU  
10 ARE ENPLANING THE CHILDREN.

11 Q WHO MADE THE DECISION AS TO WHERE THE CHILDREN  
12 WOULD BE LOCATED IN THE C5?

13 A THE MED CREW TOGETHER DID. CAPTAIN TATE AND I  
14 TALKED REALLY ABOUT IT AND DECIDED THAT WE WOULD PUT THE  
15 SMALLER CHILDREN IN THE TROOP COMPARTMENT BECAUSE IT WOULD  
16 BE EASIER TO SECURE THEM, AND WE WOULD KEEP THE OLDER  
17 CHILDREN DOWNSTAIRS. NOW, WE DID MAKE SOME EXCEPTIONS FOR  
18 VARIOUS REASONS BUT, BY AND LARGE, THE SMALLER CHILDREN WERE  
19 PLACED UPSTAIRS IN THE TROOP COMPARTMENT.

20 Q AND, HOW WERE THE CHILDREN PLACED IN THE TROOP  
21 COMPARTMENT?

22 A WELL, THE CREW MEMBERS LINED THE TROOP COMPARTMENT

1 STAIRWAY AND HANDED THEM UP HAND OVER HAND, IF YOU WILL, AND  
2 THEN THE CREW MEMBERS UP IN THE TROOP COMPARTMENT PUT THEM  
3 IN SEATS.

4 Q AND, HOW MANY CHILDREN WERE PLACED IN EACH SEAT?

5 A TWO PER SEAT.

6 Q AND, WERE ALL OF THE SEATS FILLED WITH BABIES?

7 A YES.

8 Q AND, THERE STILL WASN'T ENOUGH ROOM FOR ALL OF THE  
9 BABIES TO BE PLACED UPSTAIRS; ISN'T THAT CORRECT?

10 A THAT IS CORRECT.

11 Q DID YOU FEEL THAT IT WOULD BE SAFER FOR THE BABIES  
12 TO BE UPSTAIRS?

13 A WE FELT IT WAS BETTER TO PUT THEM UP THERE BECAUSE  
14 IT WAS EASIER TO SECURE THEM IN THE SEATS.

15 Q AND, WAS THAT FOR SAFETY'S SAKE?

16 A BECAUSE THEY WERE SO SMALL, IT WOULD BE HARD TO  
17 SECURE THEM WITHOUT PUTTING THEM IN A SEAT.

18 Q DID ANY OF THE CHILDREN EVER WIGGLE OUT OR SQUIRM  
19 OUT OF THEIR SEATS?

20 A NOT TO MY KNOWLEDGE. THE CHILDREN THAT I TOOK  
21 CARE OF OR SAW DID NOT.

22 Q AND THE REST OF THE PEOPLE ON THE C5 WERE PLACED

1 IN THE CARGO COMPARTMENT; IS THAT CORRECT?

2 A THAT IS CORRECT.

3 Q DO YOU RECALL IN WHICH AREA OF THE CARGO  
4 COMPARTMENT?

5 A TOWARD THE FRONT OF THE AIRCRAFT, DOWN TOWARD THE  
6 NOSE OF THE PLANE ACTUALLY, IN THE FORWARD PORTION OF THE  
7 CARGO COMPARTMENT.

8 Q AND, WHO SUGGESTED THAT THEY BE PLACED IN THE  
9 FORWARD SECTION OF THE CARGO COMPARTMENT.

10 A WELL, NOW MAJOR TRAYNOR DID AT THE TIME, BUT WE  
11 ALSO WOULD HAVE DONE IT ANYWAY BECAUSE WHEN YOU FLY C-141'S,  
12 WHICH IS A SIMILAR TYPE CARGO PLANE ONLY SMALLER, THE  
13 PASSENGERS ARE ALWAYS PUT, AND THE PATIENTS ARE ALWAYS PUT  
14 TOWARD THE FRONT OF THE AIRCRAFT SO THAT THE CARGO OR  
15 LUGGAGE CAN BE PLACED TOWARD THE TAIL OF THE AIRCRAFT.

16 Q NOW, WERE THERE ANY SEATS FOR THE CHILDREN IN THE  
17 CARGO COMPARTMENT?

18 A NO.

19 Q SO, THEY WERE STRAPPED TO THE FLOOR OF THE  
20 AIRPLANE WITH CARGO TIE-DOWNS; IS THAT CORRECT?

21 A SOME OF THEM WERE AND SOME OF THEM ON THE WALLS OF  
22 THE CARGO COMPARTMENT. THERE'S LIKE A LITTLE WALKWAY OR

1 LEDGE -- I DON'T KNOW WHAT THEY ACTUALLY CALL IT, BUT YOU  
2 CAN SIT DOWN THERE AND USE CARGO TIE-DOWN STRAPS MUCH LIKE A  
3 SEATBELT, AND THAT IS WHAT WE DID WITH A LOT OF THE OLDER  
4 CHILDREN AND SOME OF THE CREW MEMBERS ALSO.

5 Q NOW, WHEN THE EXPLOSIVE DECOMPRESSION OCCURRED,  
6 YOU WERE UPSTAIRS IN THE TROOP COMPARTMENT; IS THAT  
7 CORRECT?

8 A THAT IS CORRECT.

9 Q AND, YOU WERE TO THE REAR OF THE TROOP  
10 COMPARTMENT?

11 A THAT IS CORRECT.

12 Q AND, YOU KNEW AT THE TIME OF THE EXPLOSIVE  
13 DECOMPRESSION THAT YOU HAD TO GET OXYGEN; ISN'T THAT  
14 CORRECT?

15 A THAT IS CORRECT.

16 Q AND, IS THAT AS THE RESULT OF YOUR AIR FORCE  
17 TRAINING?

18 A CORRECT.

19 Q AND, HOW WOULD YOU DESCRIBE IN TERMS OF TIME THE  
20 EXPLOSIVE DECOMPRESSION?

21 A I AM NOT SURE I UNDERSTAND YOUR QUESTION.

22 Q IT WAS INSTANTANEOUS, WASN'T IT?



1 A WHAT WAS INSTANTANEOUS?

2 Q THE EXPLOSIVE DECOMPRESSION.

3 A WELL, THE SOUNDS OF THE DECOMPRESSION, YES, AND  
4 THE EXPLOSION.

5 Q AND, THE SOUND WAS AN EXPLOSIVE, VERY LARGE BOOM;  
6 ISN'T THAT CORRECT?

7 A CORRECT.

8 Q DID THE CABIN OR THE TROOP COMPARTMENT FILL WITH A  
9 FOG OR A MIST AT THE TIME OF THE EXPLOSIVE DECOMPRESSION?

10 A JUST MOMENTARILY IT FOGGED AND GOT COLDER.

11 Q NOW, I BELIEVE YOU TOLD US THAT AT THE TIME OF THE  
12 EXPLOSIVE DECOMPRESSION YOU LOOKED DOWN AND SAW SGT. PERKINS  
13 HANGING ON TO THE TOP OF THE GRATING; IS THAT CORRECT?

14 A WHEN I STOOD UP AND TURNED AROUND AFTER THE RAPID  
15 DECOMPRESSION, I SAW HIM HANGING ON TO THE GATE AT THE TOP  
16 OF THE STAIRS.

17 Q AND THE LADDER HAD BEEN RIPPED AWAY AT THE TIME OF  
18 THE EXPLOSIVE DECOMPRESSION?

19 A THAT IS CORRECT.

20 Q DID YOU LOOK DOWN INTO THE HOLE WHERE THE LADDER  
21 HAD BEEN?

22 A AT WHAT TIME?

1 Q WELL, WHEN YOU NOTICED THAT SGT. PERKINS WAS  
2 HANGING THERE?

3 A I DON'T THINK I DID AT THAT TIME. I LOOKED DOWN, --  
4 WHEN I WAS ON THE GRATING, AND LOOKED THROUGH THE GRATING.  
5 BUT, I WASN'T PAYING MUCH ATTENTION. HE WAS ONE OF THE  
6 LOADMASTER'S AND WE WERE TRYING TO GET HIM UP OVER THE  
7 GRATING. I DIDN'T REALLY LOOK DOWN AT THAT POINT.

8 Q WHEN YOU LOOKED DOWN, COULD YOU SEE THE HOLE IN  
9 THE AIRPLANE?

10 A PART OF IT.

11 Q AND YOU COULD SEE THE OCEAN DOWN BELOW; ISN'T THAT  
12 CORRECT?

13 A A SMALL PORTION OF IT, YES.

14 Q NOW, YOU DIDN'T ACTUALLY ASSIST IN PHYSICALLY  
15 PULLING SGT. PERKINS UP, DID YOU?

16 A I DON'T REALLY REMEMBER IF I DID OR NOT. I KNOW  
17 THAT WHAT I DID WAS TRY TO GET THE OXYGEN TO THEM AND ASSIST  
18 THE LOADMASTERS. AND, AS TO WHAT EXACTLY I WAS DOING AT  
19 THAT TIME, I KNOW IN GENERAL I WAS HELPING THEM, BUT AS TO  
20 EXACTLY WHAT I DID, I DON'T REMEMBER AT THIS POINT.

21 Q SO, YOU DON'T RECALL ACTUALLY PULLIN SGT. PERKINS  
22 UP?

1 A YOU MEAN BY MYSELF?

2 Q YES, MA'AM.

3 A NO, NOT BY MYSELF.

4 Q OR EVEN IN CONJUNCTION WITH ONE OF THE OTHER  
5 LOADMASTERS?

6 A I DON'T REMEMBER THAT.

7 Q NOW, YOU KNOW THAT SEVERE DECOMPRESSION SICKNESS  
8 CAN RESULT AS -- STRIKE THAT.

9 YOU KNOW THAT YOU CAN HAVE SEVERE DECOMPRESSION  
10 SICKNESS AS THE RESULT OF AN EXLOSIVE DECOMPRESSION, DON'T  
11 YOU, MA'AM?

12 A YES.

13 Q AND, IN LAY TERMS, CAN YOU DESCRIBE WHAT IS  
14 DECOMPRESSION SICKNESS?

15 A IN LAY TERMS. I GUESS THE EASIEST WAY TO DESCRIBE  
16 THAT IS THAT THERE IS NITROGEN WITHIN YOUR BLOOD SYSTEM, IN  
17 EVERYBODY'S BLOOD SYSTEM, AND DURING THE DECOMPRESSION,  
18 INSTEAD OF REMAINING IN A LIQUID STATE, IT BUBBLES OUT.

19 MR. MCMANUS: WHY DON'T WE JUST STOP THERE AND GET  
20 A NEW TAPE.

21 [VIDEO CASSETTE CHANGE.]

22 BY MR. MCMANUS:

1 Q MRS. AUNE, YOU DIDN'T CHECK ON ANY OF THE CHILDREN  
2 TO SEE IF THEY HAD OXYGEN IMMEDIATELY AFTER THE EXPLOSIVE  
-3 DECOMPRESSION, DID YOU? - -

4 A NO.

5 Q YOU DID SEE TO IT THAT SGT. PERKINS AND YOURSELF  
6 AND THE LOADMASTERS GOT OXYGEN, THOUGH; ISN'T THAT CORRECT,  
7 MA'AM?

8 A YES.

9 Q AND, ALSO, AS A RESULT OF YOUR NURSING AND AIR  
10 FORCE TRAINING, YOU KNOW THAT YOU CAN HAVE SERIOUS INJURIES  
11 TO THE EAR AS A RESULT OF AN EXPLOSIVE DECOMPRESSION; ISN'T  
12 THAT CORRECT?

13 A YES.

14 Q AND, YOU KNOW THAT HYPOXIA CAN BE THE RESULT OF AN  
15 EXPLOSIVE DECOMPRESSION; ISN'T THAT CORRECT?

16 A YES.

17 Q AND, WHAT ARE THE SIGNS OF HYPOXIA?

18 A THE SIGNS OF HYPOXIA ARE SUBJECTIVE, INDIVIDUAL.  
19 DIFFERENT PEOPLE HAVE DIFFERENT SIGNS AND SYMPTOMS. SOME  
20 GET DIZZY, SOME HAVE HEADACHES, SOME HAVE TUNNEL VISION. IT  
21 IS VERY INDIVIDUALIZED.

22 Q SO, THEY WOULD GENERALLY HAVE TO BE ABLE TO TELL

1 YOU WHETHER OR NOT THEY'RE FEELING THE SIGNS OF HYPOXIA;  
2 ISN'T THAT CORRECT?

3 A CORRECT.

4 Q AND, THESE BABIES COULDN'T TALK AND, THEREFORE,  
5 THEY COULD NOT TELL YOU WHETHER THEY WERE EXPERIENCING SIGNS  
6 OF HYPOXIA?

7 A TRUE.

8 Q AND, YOU ONLY MADE A CURSORY EXAMINATION OF THE  
9 CHILDREN, ISN'T THAT CORRECT, FOR SIGNS OF HYPOXIA?

10 A YES.

11 Q AND, YOU DIDN'T CHECK ALL OF THE CHILDREN, DID  
12 YOU?

13 A NO, I DID NOT.

14 Q AND, IN FACT, YOU ONLY CHECKED VERY FEW?

15 A TRUE.

16 Q AND, ALSO, AS A RESULT OF YOUR NURSING AND AIR  
17 FORCE TRAINING, YOU KNOW THAT BRAIN INJURY CAN BE A RESULT  
18 OF AN EXPLOSIVE DECOMPRESSION AND HYPOXIA?

19 A WHAT DO YOU MEAN BY BRAIN INJURY?

20 Q A CHILD CAN SUSTAIN INJURY TO ITS BRAIN AS THE  
21 RESULT OF AN EXPLOSIVE DECOMPRESSION; ISN'T THAT CORRECT?

22 A BUT, WHAT KIND OF INJURY ARE YOU TALKING ABOUT IN

1 TERMS OF BRAIN INJURY?

2 Q YOU KNOW A CHILD CAN SUSTAIN BRAIN INJURY OF SOME  
3 SORT AS PART OF YOUR TRAINING; ISN'T THAT CORRECT?

4 A WELL, I DON'T THINK I CAN ANSWER THAT QUESTION  
5 WITHOUT KNOWING SPECIFICALLY WHAT YOU ARE REFERRING TO.

6 Q YOU HAVE TOLD US THAT BEFORE, HAVEN'T YOU?

7 A I DON'T RECALL.

8 MR. MCMANUS: OFF TAPE.

9 MR. MCMANUS: LET ME SHOW THIS TO YOU FIRST. THIS  
10 IS FROM YOUR DEPOSITION.

11 MR. CONNORS: SHOW HER THE FRONT SHEET. WHAT PAGE  
12 ARE YOU REFERRING TO?

13 MR. MCMANUS: 19.

14 BY MR. MCMANUS:

15 Q MRS. AUNE, I HAVE GIVEN YOU A COPY OF THE  
16 TRANSCRIPT OF YOUR DEPOSITION TAKEN ON FEBRUARY 12 AND 13 OF  
17 1980, AND I HAVE REFERRED YOU TO PAGE 19 OF THAT  
18 DEPOSITION. DO YOU SEE THERE, MA'AM, WHERE YOU WERE ASKED  
19 WHETHER OR NOT YOU KNEW THAT BRAIN INJURY COULD RESULT FROM  
20 AN EXPLOSIVE DECOMPRESSION AND YOU ANSWERED YES?

21 A I ANSWERED YES, I WOULD SAY THAT WE DID LEARN  
22 THAT, BUT THAT WAS WITH QUALIFICATIONS TO IT.

1 Q WHAT ARE THOSE QUALIFICATIONS?

2 A AGAIN, I WOULD HAVE TO KNOW WHAT INJURIES YOU'RE  
3 TALKING ABOUT--IN TERMS OF BRAIN-INJURY TO SAY WHAT THEY ARE,  
4 BECAUSE NOT ALL BRAIN INJURY IS THE RESULT OF HYPOXIA OR  
5 THAT KIND OF THING.

6 Q BUT, BRAIN INJURY CAN RESULT FROM HYPOXIA AND  
7 EXPLOSIVE DECOMPRESSION; ISN'T THAT CORRECT?

8 A IT'S CORRECT, IF YOU ARE SPEAKING IN VERY BROAD,  
9 GENERAL TERMS.

10 MR. MCMANUS: OFF TAPE.

11 WE'RE NOW BACK ON TAPE.

12 BY MR. MCMANUS:

13 Q HOW WOULD YOU DESCRIBE THE CHILDREN THAT YOU SAW  
14 AFTER THE EXPLOSIVE DECOMPRESSION?

15 A MOST OF THEM, AT LEAST MOST OF THE THE ONES I SAW,  
16 WERE STILL SLEEPING. A FEW OF THEM WERE AWAKE.

17 Q AS THE MEDICAL CREW DIRECTOR, IT WAS YOUR DUTY TO  
18 TAKE CARE OF AND TAKE CHARGE OF THE BABIES' HEALTH ON THIS  
19 FLIGHT; ISN'T THAT CORRECT?

20 A HOW DO YOU MEAN HEALTH? TAKE CARE OF THEM, I  
21 COULD SAY YES, WE WOULD TAKE CARE OF THE CHILDREN NORMALLY  
22 THE WAY WE WOULD TAKE CARE OF CHILDREN IN ANY AEROVAC

1 FLIGHT.

2 Q AND, AFTER THE EXPLOSIVE DECOMPRESSION, THE BABIES  
3 IN THE TROOP COMPARTMENT DIDN'T GET VERY MUCH OXYGEN; ISN'T  
4 THAT CORRECT?

5 A I DON'T KNOW THAT. I WAS BUSY WITH THE  
6 LOADMASTERS IN THE BEGINNING AND I WENT OVER TO THE FIRST  
7 ROW OF CHILDREN TO PUT OXYGEN ON MYSELF AND PUT OXYGEN ON  
8 THEM, AND IT WAS ABOUT TIME WE WERE TOLD WE DID NOT NEED ANY  
9 OXYGEN.

10 AS TO WHAT THE REST OF THE CREW WAS DOING IN THE  
11 TROOP COMPARTMENT, I DIDN'T OBSERVE THAT.

12 Q BUT YOU DON'T KNOW IF THE CHILDREN GOT VERY MUCH  
13 OXYGEN, DO YOU?

14 A NO, I WOULD NOT KNOW ONE WAY OR THE OTHER.

15 Q AND, IN FACT, YOU BELIEVED SOME OF THE CHILDREN  
16 BECAME ANOXIC; ISN'T THAT CORRECT?

17 A THEY PROBABLY DID IN THE SENSE THAT EVERYBODY WAS  
18 A LITTLE ANOXIC, FROM BEING AT ALTITUDE TO BEGIN WITH.

19 Q AND, WHAT DOES ANOXIC MEAN?

20 A IT IS SIMILAR TO HYPOXIA -- TO BE WITHOUT OXYGEN  
21 OR TO HAVE A DECREASE IN OXYGEN. THE TERMS ARE OFTEN USED  
22 INTERCHANGEABLY.



1 Q NOW, YOU COULDN'T NECESSARILY TELL THE DIFFERENCE  
2 BETWEEN AN ANOIX BABY AND ONE THAT WAS MERELY ASLEEP, COULD  
3 YOU?

4 A YOU MEAN VISUALLY?

5 Q THAT IS CORRECT.

6 A PROBABLY NOT.

7 Q AND, AGAIN, YOU COULDN'T ASK THESE BABIES OR  
8 DIDN'T ASK THESE BABIES HOW THEY WERE FEELING; ISN'T THAT  
9 CORRECT?

10 A TRUE.

11 Q NOW, AT SOME POINT YOU PRESUMED THAT THERE WAS  
12 GOING TO BE A CRASH LANDING; IS THAT CORRECT?

13 A I DON'T KNOW THAT I PRESUMED IT WAS A CRASH  
14 LANDING. I KNEW WE WOULD BE MAKING AN EMERGENCY LANDING.

15 Q YOU HAD SEEN THE HOLE IN THE BACK OF THE PLANE?

16 A PART OF IT.

17 Q DIDN'T THAT CAUSE YOU ANY CONCERN?

18 A WELL, YES, IT CAUSED ME CONCERN, BUT FROM MY  
19 KNOWLEDGE OF THE CARGO AIRCRAFT THAT WAS FLOWN BY THE AIR  
20 FORCE, THAT THEY HAD, IN FACT, MANY OCCASIONS BEFORE LOST  
21 CLAMSHELL DOORS ON 141'S AND BEEN ABLE TO LAND THE PLANE  
22 SAFELY WITH AN EMERGENCY LANDING, AND I DID NOT HAVE ENOUGH

1 OF A VIEW TO TELL HOW MUCH DAMAGE WAS DONE TO THE PLANE.

2 Q NOW, YOUR AIR FORCE TRAINING HAS TAUGHT YOU THAT  
3 IN AN EMERGENCY LANDING SITUATION, YOU SHOULD BRACE YOURSELF  
4 AS BEST YOU CAN; IS THAT CORRECT?

5 A IN TERMS OF FLYING WITH AEROVAC PATIENTS AND  
6 PASSENGERS WITHIN MILITARY AIRCRAFT BECAUSE THEY FACE THE  
7 REAR OF THE AIRCRAFT, THERE IS A CERTAIN BRACE POSITION THAT  
8 WE TEACH THEM TO ASSUME OR TELL THEM TO ASSUME.

9 Q DID YOU ACTUALLY SEE ANY OF THE CREW MEMBERS  
10 GIVING CHILDREN OXYGEN?

11 A IN THE TROOP COMPARTMENT, YES. YOU KNOW, AS I  
12 OBSERVED JUST IN GENERAL WHAT WAS GOING ON.

13 Q AND, SOME OF THESE CHILDREN WERE UNSTRAPPED SO  
14 THEY COULD BE MOVED UP WHERE THEY COULD REACH THE OXYGEN  
15 MASKS?

16 A A FEW OF THEM WERE.

17 Q NOW, AT WHAT POINT DID YOU DETERMINE THAT YOU  
18 SHOULD BRACE YOURSELF FOR AN IMPACT?

19 A WHAT WE DID AFTER THE LOADMASTER WHO WAS ON THE  
20 HEADSET TOLD US THAT WE NO LONGER NEEDED OXYGEN, THE CREW  
21 IMMEDIATELY BEGAN TO RESTRAP THE CHILDREN WITH THE SEAT  
22 BELTS AND THE EXTRA LITTER STRAPS AND ANY OF THE TIE-DOWN

1 STRAPS THAT WE HAD AND THE BLANKETS. WE PREPARED FOR AN  
2 EMERGENCY LANDING AT THAT POINT.

3 Q AND, HOW SOON BEFORE THE IMPACT, THE FIRST IMPACT,  
4 DID YOU ASSUME YOUR BRACING POSITION?

5 A JUST A SHORT TIME. I DON'T KNOW THAT I COULD GIVE  
6 YOU A TRUE ESTIMATE. PROBABLY A MINUTE OR SO.

7 Q AND, YOU BROKE SEVERAL BONES IN YOUR FOOT AND HAD  
8 SOME SEVERE CUTS AND BRUISES ALL OVER YOUR BODY; ISN'T THAT  
9 CORRECT?

10 A THAT IS CORRECT.

11 Q AND, IS IT YOUR TESTIMONY THAT YOU DON'T RECALL  
12 PRECISELY WHEN YOU SUSTAINED THOSE INJURIES?

13 A I DON'T RECALL PRECISELY BECAUSE I PRESUMED THAT I  
14 GOT THEM AS I WAS SLIDING DOWN THE AISLE OF THE AIRCRAFT.

15 Q NOW, YOU SLID ALMOST HALF THE LENGTH OF THE TROOP  
16 COMPARTMENT; ISN'T THAT CORRECT?

17 A YES.

18 Q AND, YOU'RE NOT TELLING ME THIS WAS JUST A GENTLE  
19 SLIDE TO THE FRONT OF THE AIRCRAFT, ARE YOU?

20 A WELL, NO, IT WASN'T A GENTLE SLIDE, BUT IT, YOU  
21 KNOW, IT WAS JUST A SLIDING MOTION.

22 Q THE AIRCRAFT WAS MOVING FORWARD; ISN'T THAT

1 CORRECT, MA'AM?

2 A YES.

3 Q AT A VERY GREAT RATE OF SPEED?

4 A YES.

5 Q WAS THE AIRCRAFT TITLED WITH THE NOSE-END DOWN  
6 DURING THIS TIME THAT YOU WERE SLIDING?

7 A THERE WAS NO WAY FOR ME TO ASSESS THAT.

8 Q YOU COULDN'T FEEL THAT?

9 A I JUST FELT THE SLIDING MOTION MYSELF AS I SLID  
10 DOWN THE AISLE. I COULDN'T ESTIMATE WHAT POSITION THE  
11 AIRCRAFT WAS IN AT THAT TIME.

12 Q IS THAT BECAUSE OF YOUR FRAME OF MIND AT THE TIME?

13 A WHAT DO YOU MEAN BY FRAME OF MIND?

14 Q WERE YOU NERVOUS? WERE YOU SCARED?

15 A NO, I WASN'T SCARED AT ALL.

16 Q BUT YOU CAN'T REMEMBER IF THE AIRPLANE WAS TILTING  
17 FORWARD OR NOT?

18 A NO.

19 Q ISN'T IT TRUE THAT WHAT CAUSED YOU TO SLIDE  
20 FORWARD TO THE FRONT OF THE AIRCRAFT WAS THE VIOLENT  
21 STOPPING OF THE TROOP COMPARTMENT?

22 MR. CONNORS: I WILL OBJECT TO THAT.

1 THE DEPONENT: I'M SUPPOSED TO ANSWER THAT THEN?

2 MR. CONNORS: YOU CAN GO AHEAD AND ANSWER THAT.

3 THE DEPONENT: OKAY. NO, I AM NOT SURE WHAT

4 CAUSED ME TO SLIDE. I BELIEVE WE IMPACTED A SECOND TIME,

5 BUT I HAD ALSO LET GO AND ACTUALLY HAD TAKEN MYSELF OUT OF

6 MY BRACE POSITION IN ORDER TO GRAB SGT. HADLEY'S ANKLE.

7 BY MR. MCMANUS:

8 Q THE PLANE DID STOP VIOLENTLY, DIDN'T IT?

9 A IT GRADUALLY CAME TO A STOP.

10 Q THAT'S WHAT CAUSED YOU TO SLIDE FORWARD?

11 A NO. I SAID THAT AT THE TIME THAT I THINK WE HAD  
12 THE SECOND IMPACT, I HAD LET GO; I WAS HOLDING ON TO THE  
13 LEGS OF ONE OF THE SEATS. I HAD LET GO TO GRAB SGT.  
14 HADLEY'S ANKLE. AND, I BELIEVE IT WAS ABOUT THAT TIME THAT  
15 WE HAD ANOTHER IMPACT, AND IT WAS THE FORCE OF THE IMPACT  
16 THAT CAUSED ME TO SLIDE FORWARD, BUT WE WERE STILL MOVING.

17 Q WELL, HOW SOON BEFORE THE TROOP COMPARTMENT CAME  
18 TO A REST DID YOU FIND YOURSELF UP AGAINST THE FORWARD  
19 BULKHEAD?

20 A IT WAS JUST A SHORT PERIOD OF TIME. I DON'T KNOW  
21 THAT.

22 Q ISN'T IT TRUE THAT YOU FOUND YOURSELF AT THE

1 FORWARD BULKHEAD IMMEDIATELY AFTER THE AIRPLANE CAME TO A  
2 STOP?

3 A I AM NOT SURE. I RECALL SLIDING AND THE AIRCRAFT  
4 WAS MOVING AND THEN, AT SOME POINT, I STOPPED AND IT  
5 STOPPED. NOW, WHETHER IT WAS ALL AT THE SAME TIME, I DON'T  
6 KNOW.

7 Q NOW, YOU HAVE DESCRIBED THE MOTION OF THE TROOP  
8 COMPARTMENT AFTER THE SECOND IMPACT AS BEING LIKE A  
9 SPEEDBOAT GOING THROUGH THE WATER; ISN'T THAT CORRECT?

10 A CORRECT.

11 Q AND, AT SOME POINT YOU KNEW THAT THE TROOP  
12 COMPARTMENT HAD SEPARATED FROM THE REST OF THE AIRCRAFT;  
13 ISN'T THAT CORRECT?

14 A CORRECT.

15 Q AND, YOU DESCRIBED THE TROOP COMPARTMENT AS BEING  
16 JUST LIKE AN INDEPENDENT LITTLE AIRPLANE MOVING OVER THE  
17 GROUND; ISN'T THAT CORRECT?

18 A AS AN INDEPENDENT AIRPLANE GOING OVER THE GROUND?  
19 NO, I DESCRIBED IT AS AN INDEPENDENT LITTLE QUONSET HUT, BUT  
20 THAT WAS AFTER I STEPPED OUT OF IT AND COULD SEE WHERE WE  
21 WERE.

22 Q YOU DIDN'T SAY THAT AS THE TROOP COMPARTMENT WAS

1 MOVING ALONG YOU FELT IT WAS LIKE A LITTLE, AN INDEPENDENT  
2 LITTLE PART OF THE PLANE?

3 A NOT THAT I RECALL, -NO. I WAS MOVING -- IT WAS -  
4 MOVING ALONG AND IT WAS LIKE A SPEEDBOAT TO ME. THAT WAS  
5 WHAT I DESCRIBED IT AS, AS A SPEEDBOAT WITH THE MUD COMING  
6 UP AND STINGING MY FACE AND STINGING ME. I DIDN'T KNOW  
7 UNTIL AFTERWARDS WHAT IT LOOKED LIKE.

8 MR. MCMANUS: OFF CAMERA.

9 DO YOU HAVE A CLEANER COPY OF THIS?

10 MR. CONNORS: WHAT PAGE ARE YOU ON?

11 MR. MCMANUS: PAGE 5. I WILL PUT TWO LITTLE DOTS  
12 ON THERE AND ASK HER TO READ A PORTION OF IT.

13 BY MR. MCMANUS:

14 Q MRS. AUNE, DO YOU RECALL GIVING A SWORN STATEMENT  
15 TO THE AIR FORCE ACCIDENT INVESTIGATORS ON MAY 5, 1975?

16 A I GAVE IT BEFORE MAY 5.

17 Q DO YOU RECALL WHAT THE DATE WAS?

18 A IT WAS WHILE I WAS STILL IN THE HOSPITAL.

19 Q AND, DO YOU HAVE A COPY OF THAT STATEMENT IN FRONT  
20 OF YOU?

21 A YES.

22 Q I WOULD LIKE YOU READ THE PORTIONS I HAVE MARKED

1 ON PAGE 5.

2 MR. CONNORS: NOTE MY OBJECTION TO LIMITING HER TO  
3 READING ANY ~~PART~~ PARTICULAR PORTION. SHE SHOULD BE FREE TO  
4 QUALIFY THAT ANYWAY SHE HAS TO.

5 THE DEPONENT: OKAY.

6 BY MR. MCMAHUS:

7 Q COULD YOU READ IT TO ME, PLEASE?

8 A OKAY. "ABOUT THE SECOND IMPACT WAS KIND OF LIKE --  
9 AFTER WE IMPACTED THE SECOND TIME -- WAS SORT OF LIKE A  
10 SPEEDBOAT GOING THROUGH WATER. THIS WATER WAS ALL MUD THAT  
11 WAS POURING IN. WE HAD BEEN SEPARATED I GUESS FROM THE REST  
12 OF THE AIRCRAFT. WE WERE JUST LIKE AN INDEPENDENT LITTLE  
13 PART OF THE PLANE. WE WERE JUST TEARING THROUGH THERE AT  
14 WHAT SEEMED LIKE A TREMENDOUS RATE OF SPEED AND ALL THIS MUD  
15 WAS FLOWING IN. WE WERE JUST COMPLETELY COVERED WITH IT.  
16 ALL I CAN REMEMBER IS THE SPEEDBOAT GOING -- SPEEDING RIGHT  
17 THROUGH THAT MUD. WE CAME TO A STOP."

18 I WAS MAKING A GUESS AS TO WHAT WAS GOING ON.

19 Q BUT, THAT WAS YOUR BEST RECOLLECTION JUST SHORTLY  
20 AFTER THE CRASH, WASN'T IT?

21 A YES.

22 Q AND, YOU WERE UNDER OATH, WHEN YOU MADE THAT



1 STATEMENT?

2 A YES, AND I SAID I GUESSED THAT IS WHAT HAPPENED.

3 ~~Q -- NOW, -- AFTER THE TROOP COMPARTMENT STOPPED, -- YOU~~  
4 EXITED; IS THAT CORRECT?

5 A AFTER THE TROOP COMPARTMENT STOPPED, I WALKED  
6 THROUGH IT TO SEE THE CONDITION OF THE CHILDREN BEFORE I  
7 EXITED.

8 Q AND YOU GAVE THEM A CURSORY LOOK OVER AT THAT  
9 TIME; IS THAT CORRECT?

10 A CORRECT.

11 Q AND, DO YOU RECALL WHAT YOU SAW, WHEN YOU GOT OUT  
12 OF THE TROOP COMPARTMENT?

13 A I SAW THE FLIGHT DECK OFF TO OUR LEFT, QUITE A  
14 DISTANCE AND UPSIDE DOWN. I SAW THE SMOKE AND THE FLAMES  
15 FROM THE FIRE FARTHER IN THE DISTANCE.

16 Q DID YOU SEE ANY OF THE REST OF THE AIRPLANE?

17 A NO.

18 Q IN FACT, MOST OF THE AIRPLANE THAT YOU HAD STARTED  
19 OFF ON HAD DISINTEGRATED; ISN'T THAT CORRECT?

20 A IT WAS GONE.

21 Q AND, IS IT YOUR TESTIMONY THAT THAT WAS A VIOLENT  
22 AIRPLANE CRASH?

1 A WELL, I DON'T THINK I SAID IT WAS VIOLENT. IT WAS  
2 -- IF YOU'RE TALKING ABOUT THE IMPACTS OR THE ENTIRE CRASH?  
3 WHICH ARE-YOU TALKING ABOUT? THE WHOLE THING? --

4 Q IT WAS A VIOLENT AIRPLANE CRASH, WASN'T IT, THE  
5 IMPACT AND THE DISINTEGRATION OF THE AIRPLANE?

6 A I DIDN'T KNOW AS FAR AS WHAT I FELT IN THE TROOP  
7 COMPARTMENT THAT THE IMPACT WAS THAT VIOLENT.

8 Q WHEN YOU LOOKED AROUND AND SAW THE REST OF THE  
9 AIRPLANE HAD DISINTEGRATED, YOU DIDN'T THINK THAT THERE HAD  
10 BEEN A VIOLENT CRASH?

11 A WELL, I KNEW THAT AT THAT POINT, BUT PREVIOUS TO  
12 THAT I DID NOT THAT. I ONLY HAD THE EXPERIENCE OF BEING IN  
13 THE TROOP COMPARTMENT AND KNOWING WHAT I FELT THERE.

14 Q AND, DO YOU RECALL HOW MANY PEOPLE DIED IN THE  
15 TROOP COMPARTMENT AS A RESULT OF THIS ACCIDENT?

16 A AT THE MOST THAT I KNOW OF IS 3 THAT DIED IN THE  
17 TROOP COMPARTMENT, 2 OR 3.

18 Q DO YOU RECALL THE NAMES OF ANY OF THOSE PEOPLE?

19 A I DID NOT KNOW IT UNTIL AFTERWARDS, ANYWAY.

20 Q YOU DIDN'T SEE ANY DEAD BODIES IN THE TROOP  
21 COMPARTMENT?

22 A NOT THAT I RECALL, WHEN I WENT THROUGH THE TROOP

1 COMPARTMENT.

2 Q DID YOU KNOW SGT. PARKER?

3 A YES.

4 Q DID YOU KNOW THAT HE DIED AS A RESULT OF THE  
5 CRASH?

6 A YES.

7 Q AND, YOU KNOW THAT PART OF HIS HEAD WAS KNOCKED  
8 OFF DURING THE COURSE OF THE CRASH; ISN'T THAT CORRECT?

9 A YES.

10 Q AND, DID ANYONE EVER TELL YOU THAT ONE OF THE  
11 FEMALE CIVILIAN PASSENGERS HAD BEEN SEVERED IN HALF AS A  
12 RESULT OF THE CRASH?

13 A NO.

14 Q DID YOU SEE HER BODY AT ALL IN THE TROOP  
15 COMPARTMENT?

16 A NO.

17 Q AND, HOW MANY BABIES DIED AS A RESULT OF THE  
18 CRASH?

19 A I WAS TOLD LATER THAT ONE HAD DIED, BUT I DIDN'T  
20 SEE THAT BABY.

21 Q AND, WERE YOU TOLD THAT THAT BABY DIED OF ANY  
22 PARTICULAR REASON?

1 A NO.

2 Q DID YOU EVER TELL ANYONE THAT THAT BABY DIED WHEN  
3 AN OXYGEN CORD FROM AN ~~OXYGEN~~ MASK STRANGLED THAT BABY?

4 A NO, BECAUSE I DID NOT SEE THAT BABY. I WAS TOLD,  
5 LATER THAT THAT BABY HAD DIED.

6 Q WERE YOU EVER ADVISED THAT SOME OF THE NURSES  
7 THOUGHT THAT MORE THAN ONE BABY DIED?

8 A NOT THAT I CAN RECALL.

9 Q HOW MANY NURSES WERE IN THE TROOP COMPARTMENT AT  
10 THE TIME OF THE CRASH?

11 A THREE.

12 Q AND, WHAT WERE THEIR NAMES?

13 A WELL, LIEUTENANT WIRTZ, WHO IS NOW CAPTAIN TATE;  
14 LIEUTENANT GOFFINET, WHO IS NOW MRS. NEILL; AND MYSELF.

15 Q NOW, THE HELICOPTERS ARRIVED ON THE SCENE WITHIN  
16 JUST A FEW MINUTES; ISN'T THAT CORRECT?

17 A CORRECT.

18 Q AND, THE BABIES WERE TAKEN FROM THE PLANE TO THE  
19 HELICOPTERS?

20 A CORRECT.

21 Q AND, I BELIEVE YOU HAVE TOLD US BEFORE THAT MOST  
22 OF THE CHILDREN WERE STILL ASLEEP AT THIS TIME; ISN'T THAT

1 CORRECT?

2 A A GOOD PORTION OF THEM WERE, YES.

3 ~~Q~~ DID IT EVER OCCUR TO YOU THAT THOSE BABIES WERE

4 UNCONSCIOUS OR HYPOXIC?

5 A I DON'T THINK SO.

6 Q BUT YOU NEVER CAREFULLY CHECKED THEM TO MAKE SURE,

7 DID YOU?

8 A HOW DO YOU MEAN CAREFULLY CHECKED THEM?

9 Q DID YOU CHECK THEM AT ALL?

10 A WE CHECKED THEM AS WE TOOK THEM TO THE

11 HELICOPTERS. YOU KNOW, THEY SEEMED TO BE ALL RIGHT. THEY

12 STARTED TO WAKE UP AFTER WE STARTED EVACUATING THEM.

13 Q WHEN YOU WERE ON THE GROUND?

14 A YES, AFTER WE'D STOPPED.

15 Q WHERE THERE WAS NO PROBLEM WITH OXYGEN?

16 A CORRECT.

17 Q NOW, YOU WERE PLACED IN THE INTENSIVE CARE UNIT AT

18 CLARK AIR FORCE BASE HOSPITAL IN THE PHILIPPINES AFTER THE

19 CRASH; ISN'T THAT CORRECT?

20 A CORRECT.

21 Q AND, YOU WERE AIR EVACUATED THERE ON A REGULAR AIR

22 FORCE MEDICAL EVACUATION PLANE; ISN'T THAT CORRECT?

1 A CORRECT.

2 Q AND, THAT WAS RIGHT AFTER THE CRASH?

3 A IT WAS SEVERAL HOURS LATER.

4 Q DID YOU GO TO THE SEVENTH DAY ADVENTIST HOSPITAL?

5 A YES, I DID.

6 Q BUT YOU DIDN'T SEE WHAT CARE WAS ADMINISTERED TO  
7 THE CHILDREN, IF ANY, AT THAT TIME, DID YOU?

8 A NO, THEY TOOK US IN A DIFFERENT ROOM THAN THEY  
9 TOOK THE CHILDREN.

10 Q NOW, HOW LONG WERE YOU AT THE CLARK HOSPITAL?

11 A I WAS AT THE HOSPITAL UNTIL THE 19TH OF APRIL, I  
12 BELIEVE.

13 Q AND, AT SOME TIME BEFORE YOU WERE EVACUATED FROM  
14 THE SCENE, YOU DID LOSE CONSCIOUSNESS; IS THAT CORRECT?

15 A CORRECT.

16 Q AND, DO YOU KNOW HOW LONG YOU WERE UNCONSCIOUS?

17 A NO, I DON'T KNOW EXACTLY HOW LONG. IT COULDN'T  
18 HAVE BEEN VERY LONG.

19 Q AND, WHEN YOU ARRIVED AT CLARK, THE DOCTORS AND  
20 TECHNICIANS THERE PUT THEIR DISASTER PLAN INTO EFFECT FOR  
21 THE CREW MEMBERS, YOU AND THE OTHER CREW MEMBERS; ISN'T THAT  
22 CORRECT?

1 A CORRECT.

2 Q WERE ANY OF THE BABIES TAKEN WITH YOU TO CLARK AIR  
3 -FORCE HOSPITAL? —

4 A NO, NONE WERE ON THE C9, WHEN WE WENT BACK TO  
5 CLARK.

6 Q DID YOU EVER SEE ANY AT THE CLARK HOSPITAL WHILE  
7 YOU WERE THERE?

8 A NO, I DID NOT.

9 Q DO YOU KNOW WHAT HAPPENED TO THE BABIES  
10 AFTERWARDS?

11 A I WAS TOLD WHAT HAPPENED TO THEM, BUT I DID NOT  
12 SEE FOR MYSELF WHAT HAPPENED TO THEM.

13 Q AND, WHAT WERE YOU TOLD?

14 A I WAS TOLD THEY WERE BROUGHT OUT, YOU KNOW, IN  
15 SUCCESSIVE DAYS THEN TO CLARK AND THEN BROUGHT TO THE STATES  
16 ON OTHER AIR FORCE PLANES.

17 Q AND, THEY WERE NEVER HOSPITALIZED FOR OBSERVATION,  
18 WERE THEY?

19 A I BELIEVE THEY KEPT THEM AT THE SEVENTH DAY  
20 ADVENTIST HOSPITAL THAT NIGHT. I ASKED ONE OF THE  
21 PHYSICIANS IF THAT IS WHAT THEY DID AND HE SAID THEY HAD  
22 KEPT THEM THERE.

1 Q THEY HAD KEPT THEM OVERNIGHT?

2 A YES.

3 Q NOW, YOU'VE SINCE HEARD THAT THAT'S NOT CORRECT, ...  
4 HAVEN'T YOU?

5 A NO, I HAVE NOT.

6 Q SO, IT'S YOUR BELIEF THAT THE BABIES WERE KEPT  
7 OVERNIGHT AT THE HOSPITAL?

8 A AT THE SEVENTH DAY ADVENTIST HOSPITAL, YES. THAT  
9 WAS MY UNDERSTANDING.

10 Q WAS THAT ALL THE BABIES THAT WERE INVOLVED IN THE  
11 CRASH?

12 A AS FAR AS I KNOW.

13 Q NOW, WHEN YOU FIRST STEPPED OUT OF THE TROOP  
14 COMPARTMENT, DID YOU HAVE TO STEP DOWN ANY DISTANCE?

15 A I DON'T REMEMBER WHETHER IT WAS ACTUALLY STEPPING  
16 DOWN OR, YOU KNOW, STEPING INTO THE MUDDY, MARSHY TERRAIN  
17 AND FINDING MYSELF IN PRACTICALLY KNEE-DEEP MUD.

18 Q WELL, YOU WERE AT GROUND LEVEL AT THAT POINT,  
19 WEREN'T YOU?

20 A YES.

21 Q AND, NORMALLY, IF YOU HAD LANDED ON A RUNWAY, HOW  
22 HIGH UP WOULD THE TROOP COMPARTMENT HAVE BEEN?



1           A       I DON'T KNOW WHAT THE HEIGHT OF A C5 IS, BUT THE  
2   TROOP COMPARTMENT IS, OF COURSE, ON THE TOP OF THE PLANE.  
3   SO, YOU COME DOWN FROM THE TROOP COMPARTMENT TO THE CARGO —  
4   COMPARTMENT, AND DOWN THE STEPS. SO, IT'S A GOOD NUMBER OF  
5   STEPS.

6           Q       SO YOU WOULD BE THREE OR FOUR STORIES ABOVE THE  
7   GROUND, ISN'T THAT CORRECT?

8           A       I DON'T REALLY KNOW. I DON'T KNOW HIGH A C5 IS.

9           Q       AND, WHEN YOU LOOKED OVER AT THE FLIGHT DECK, YOU  
10  THOUGHT EVERYONE WAS DEAD IN THERE; ISN'T THAT CORRECT?

11          A       THAT IS CORRECT, BECAUSE I DIDN'T SEE ANYBODY AT  
12  FIRST.

13          Q       AND, ALSO BECAUSE THAT WAS SUCH A HORRIBLE SCENE,  
14  WASN'T IT?

15          A       NOT THAT I RECALL. IT WAS UPSIDE DOWN, AND WE  
16  DIDN'T SEE ANYBODY GETTING OUT, AND I THOUGHT AT FIRST THAT  
17  THEY WERE DEAD AND ALMOST AT THE MOMENT I THOUGHT THAT, THEN  
18  A FEW OF THEM STARTING COMING OUT AND COMING OVER.

19          Q       DID YOU SEE ANY DEAD BODIES ON THE GROUND?

20          A       NOT THAT I RECALL, NO.

21          Q       DO YOU KNOW THAT OVER 150 PEOPLE DIED AS A RESULT  
22  OF THIS CRASH?

1 A YES, I WAS TOLD THAT LATER.

2 Q HOW LONG WAS IT AFTER THIS CRASH BEFORE YOU FLEW  
3 AGAIN? -----

4 A YOU MEAN FLEW AS A CREW MEMBER OR FLEW IN AN  
5 AIRPLANE?

6 Q FLEW AS A CREW MEMBER.

7 A I NEVER FLEW AS A CREW MEMBER AGAIN.

8 Q AND, YOU DID SUSTAIN BROKEN BONES AS A RESULT OF  
9 THE CRASH?

10 A YES, I DID.

11 Q DID IT EVER OCCUR TO YOU THAT IF A BABY WOULD  
12 SLEEP THROUGH THE NOISE OF THE EXPLOSIVE DECOMPRESSION AND  
13 THROUGH A CRASH LANDING THAT WAS HARD ENOUGH TO BREAK YOUR  
14 BONES, THAT THERE WAS SOMETHING WRONG WITH THOSE BABIES?

15 A NO. WHAT THOUGHT I HAD WHEN I SAW THAT THEY SLEPT  
16 THROUGH THE RAPID DECOMPRESSION WAS THESE CHILDREN HAD BEEN  
17 SO USED TO LOUD EXPLOSIVE SOUNDS, THEY WERE LIVING IN A WAR-  
18 TORN COUNTRY, THAT THEY HAD ADJUSTED TO IT, TO THE SOUNDS OF  
19 LOUD EXPLOSIONS.

20 Q BUT YOU KNEW THAT AN EXPLOSIVE DECOMPRESSION COULD  
21 LEAD TO HYPOXIA AND HYPOXIA COULD LEAD TO INJURY, ISN'T THAT  
22 CORRECT?

1 A IF IT'S PROLONGED, YES.

2 MR. MCMANUS: THANK YOU. I HAVE NO FURTHER  
3 QUESTIONS.

4 MR. CONNORS: I HAVE A FEW QUESTIONS ON REDIRECT.

5 REDIRECT EXAMINATION

6 BY MR. CONNORS:

7 Q MRS. AUNE, DO YOU RECALL THE SERIES OF QUESTIONS  
8 WHICH MR. MCMANUS ASKED YOU REGARDING WHETHER YOU HAD FLOWN  
9 ON A C5A BEFORE?

10 A YES, I DO.

11 Q NOW, IS A C5A USUALLY USED FOR MED EVAC OR MEDICAL  
12 PURPOSES?

13 A NOT USUALLY.

14 Q WHAT TYPES OF AIRCRAFT ARE USED FOR THAT SORT  
15 PURPOSE?

16 A THERE'S TWO PRIMARILY USED FOR AIREVAC. ONE IS  
17 THE C9 NIGHTINGALE WHICH IS A SPECIALLY EQUIPPED PLANE, IT  
18 WAS DESIGNED JUST FOR THE EVACUATION OF MEDICAL PATIENTS.  
19 THE OTHER ONE USED IS THE C141 WHICH IS A LONG-RANGE CARGO  
20 JET THAT CAN HAVE PASSENGER SEATS PUT IN IT OR LITTERS IN  
21 ORDER TO ACCOMMODATE PATIENTS.

22 Q AND, ARE NURSES USUALLY ASSIGNED TO THOSE AIRCRAFT .

1 AS OPPOSED TO C5A'S?

2 A CORRECT.

3 Q -- DO YOU FIND ANYTHING UNUSUAL IN THE FACT THAT A  
4 C5A PILOT, SUCH AS MAJOR TRAYNOR, HAD NOT FLOWN A MEDIVAC  
5 MISSION BEFORE?

6 A NO, BECAUSE HE WAS A C5A PILOT AND THOSE WERE NOT  
7 CUSTOMARLY USED FOR AIREVAC.

8 Q YOU MENTIONED THAT SOME OF THE CHILDREN -- STRIKE  
9 THAT.

10 DO YOU RECALL THE SERIES OF QUESTIONS IN WHICH  
11 MR. MCMANUS ASKED YOU THE DETAILS ABOUT THE LOADING OF THE  
12 SMALLER CHILDREN INTO THE TROOP COMPARTMENT?

13 A YES.

14 Q ONE OF YOUR ANSWERS THERE, YOU INDICATED THAT  
15 THERE WERE SOME EXCEPTIONS TO LOADING ONLY THE SMALLER  
16 CHILDREN IN THE TROOP COMPARTMENT. WHAT WERE THOSE  
17 EXCEPTIONS?

18 A THERE WERE SEVERAL OLDER CHILDREN THAT WE DID PUT  
19 UP THERE. ONE CHILD HAD CRUTCHES, AS I RECALL, AND WE  
20 DECIDED TO PUT HER UP THERE BECAUSE WE FELT WE COULD SECURE  
21 ANOTHER OLDER CHILD THAT THEY TOLD US WAS BLIND; WE CHOSE TO  
22 PUT HER UP THERE BECAUSE WE FELT WE COULD TAKE BETTER CARE

1 OR, YOU KNOW, SECURE THE CHILD BETTER BECAUSE THE CHILD  
2 COULD NOT SEE.

3 Q YOU MENTIONED AT THE TIME OF THE DECOMPRESSION  
4 THAT A MIST FORMED AND IT FELT COLDER. DID THE TEMPERATURE  
5 EVER REACH SUCH A DEGREE THAT YOU HAD TO REQUEST FOR  
6 ADDITIONAL HEATING OR HEATING EQUIPMENT EQUIPMENT IN THE  
7 TROOP COMPARTMENT?

8 A NO.

9 Q DO YOU RECALL THOSE SERIES OF QUESTIONS ASKED BY  
10 MR. MCMANUS WHICH RELATE TO THE FACT THAT YOU WERE HELPING  
11 SGT. PERKINS AND THE OTHER CREW MEMBER AS OPPOSED TO GIVING  
12 OXYGEN TO THE CHILDREN?

13 A YES.

14 Q IS THERE ANY REASON WHY IT IS IMPORTANT FOR THE  
15 ADULTS IN A SITUATION LIKE THAT TO HAVE OXYGEN BEFORE THE  
16 CHILDREN?

17 A THERE ARE SEVERAL THAT YOU COULD USE. FIRST OF  
18 ALL, CHILDREN, ESPECIALLY SLEEPING CHILDREN, WOULD BE AT  
19 LESS RISK FROM A BRIEF EPISODE OF HYPOXIA THAN AN ADULT WHO  
20 IS ACTIVE AND WORKING.

21 SECONDLY, IN FLIGHT SCHOOL, ONE OF THE MAJOR  
22 THINGS YOU LEARN IS TO TAKE CARE OF THE CREW, NOT BECAUSE

1 YOU ARE NOT CONCERNED FOR THE PATIENTS BUT THE FACT IS IF  
2 YOU HAVE CREW MEMBERS WHO ARE NOT ABLE TO FUNCTION, THERE IS  
3 NO ONE WHO IS THERE WHO CAN TO TAKE CARE OF THE PATIENTS.

4 Q DO YOU RECALL THAT SERIES OF QUESTIONS WHICH MR.  
5 MCMANUS ASKED REGARDING WHETHER OR NOT YOU COULD TELL IF A  
6 SLEEPING CHILD WAS SUFFERING FROM HYPOXIA OR ANOXIA?

7 A CORRECT. YES, I DO.

8 Q OKAY. BASED ON YOUR OWN EXPERIENCE IN THE TROOP  
9 COMPARTMENT, PERFORMING THE WORK WHICH YOU WERE DOING DURING  
10 THAT PERIOD AFTER THE RAPID DECOMPRESSION, AND BASED ON YOUR  
11 OWN EXPERIENCE WITH REGARD TO THE FACT THAT YOU'VE STATED  
12 YOU HAD NOT SUFFERED ANY SYMPTOMS OF HYPOXIA, DID YOU HAVE  
13 ANY REASON TO BELIEVE THAT THE CHILDREN WOULD HAVE SUFFERED  
14 FROM HYPOXIA DURING THAT PERIOD?

15 MR. MCMANUS: I OBJECT TO THAT QUESTION.

16 MR. CONNORS: ON WHAT GROUNDS?

17 MR. MCMANUS: SHE'S ALREADY SAID SHE DID NOT  
18 EXAMINE THEM.

19 MR. CONNORS: I WILL RESTATE THE QUESTION FOR THE  
20 RECORD.

21 MR. MCMANUS: IF YOU ARE GOING TO ASK THE SAME  
22 QUESTION, THERE IS NO NEED TO. I'VE MADE MY OBJECTION FOR

1 THE RECORD.

2 MR CONNORS: I'D LIKE A CLEAN QUESTION AND ANSWER.

3 BY MR. CONNORS:

4 Q BASED ON YOUR EXPERIENCE IN THE TROOP COMPARTMENT  
5 FOLLOWING THE DECOMPRESSION, AND THE FACT THAT WERE WORKING  
6 WITHOUT OXYGEN, AND THE FACT THAT YOU HAVE ALREADY STATED YOU  
7 DID NOT SUFFER ANY SYMPTOMS OF HYPOXIA WHICH YOU'D NOTED, DID  
8 YOU HAVE ANY REASON TO BELIEVE THAT THE CHILDREN HAD SUFFERED  
9 ANY SYMPTOMS OF HYPOXIA OR ANY PROLONGED HYPOXIC EPISODE?

10 A NO, I WOULDN'T THINK THEY DID, PARTICULARLY NOT IF  
11 THEY WERE SLEEPING, SINCE THEIR NEEDS FOR OXYGEN ARE DECREASED  
12 DURING SLEEP.

13 Q DO YOU RECALL THE QUESTION MR. MC MANUS ASKED YOU  
14 REGARDING YOUR PRIOR STATEMENT AND THE PORTION ABOUT THE  
15 TROOP COMPARTMENT MOVING THROUGH THE WATER LIKE A SPEEDBOAT  
16 AND HAVING SEPARATED FROM THE REST OF THE AIRCRAFT?

17 A YES.

18 Q APPROXIMATELY WHEN WAS THAT STATEMENT ORIGINALLY  
19 GIVEN?

20 A TWO OR THREE DAYS AFTER THE CRASH.

21 Q AND, WAS THAT BASED ON ALL THE INFORMATION YOU HAD  
22 AT THAT TIME?

1 A YES.

2 Q AND, DID THAT INCLUDE THE FACT THAT YOU HAD STEPPED  
3 OUTSIDE THE TROOP COMPARTMENT AND OBSERVED IT FROM THE OUTSIDE  
4 AFTER IT HAD COME TO REST?

5 A YES.

6 Q DO YOU RECALL THOSE QUESTIONS THAT MR. MCMANUS  
7 ASKED YOU REGARDING THE FACT THAT YOU BECAME UNCONSCIOUS  
8 AFTER THE ACCIDENT?

9 A YES.

10 Q WOULD YOU DESCRIBE THE CIRCUMSTANCES OF THAT FOR  
11 US, PLEASE?

12 A OKAY. I HAD BEEN EVACUATING CHILDREN TO THE  
13 HELICOPTERS, AND WE WERE CARRYING THEM, TWO OR THREE AT A  
14 TIME, AS MANY AS WE COULD CARRY TO THE HELICOPTERS. AND, I  
15 WENT BACK TO -- I HAD TAKEN ONE ARMLoad OF CHILDREN TO THE  
16 HELICOPTERS AND WAS WALKING BACK TO THE TROOP COMPARTMENT, AND  
17 ONE OF THE -- THE EDGE OF THE FUSELAGE THAT WAS BENT UP, I  
18 GUESS, ONE OF THE CHILDREN WAS LYING ON THAT AND HAD STARTED  
19 TO CRAWL OFF. AND, I WANTED TO GRAB HIM BEFORE HE FELL IN THE  
20 MUD OR SHE FELL IN THE MUD AND REACHED DOWN TO GRAB HIM BY THE  
21 SEAT OF HIS PANTS BECAUSE THAT WAS THE ONLY PART OF HIM I  
22 COULD GET AND REALIZED THAT I COULDN'T BEND DOWN AT THAT



1 POINT. SOMEHOW I MANAGED TO GET HIM IN MY HANDS, HOLDING HIM  
2 UPSIDE DOWN, AND THAT IS THE POINT AT WHICH I DON'T REMEMBER,  
3 AND THE NEXT THING I REMEMBER WAS BEING PLACED IN A  
4 HELICOPTER.

5 Q DO YOU RECALL MR. MCMANUS ASKING YOU ABOUT YOUR  
6 KNOWLEDGE OF WHAT HAPPENED TO THE CHILDREN AFTER THEY WERE  
7 EVACUATED TO THE SEVENTH DAY ADVENTIST HOSPITAL?

8 A YES.

9 Q AND, DO YOU ALSO RECALL HIS QUESTION REGARDING AS TO  
10 WHETHER OR NOT YOU KNEW IF THEY HAD STAYED THERE OVER NIGHT?

11 A YES.

12 Q WAS THAT INFORMATION BASED ON INFORMATION PROVIDED  
13 TO YOU BY OTHER INDIVIDUALS?

14 A YES.

15 Q DID YOU HAVE ANY PERSONAL KNOWLEDGE OF WHAT ACTUALLY  
16 HAPPENED TO THE CHILDREN?

17 A NO.

18 Q DO YOU RECALL MR. MCMANUS ASKING YOU WHETHER OR NOT  
19 YOU EVER AGAIN FLEW AS A CREW MEMBER?

20 A YES.

21 Q YOU INDICATED THAT YOU HAD NOT; IS THAT CORRECT?

22 A CORRECT.

1 Q WOULD YOU DESCRIBE THE CIRCUMSTANCES OF THAT,  
2 PLEASE.

3 A I DID NOT FLY AS A CREW MEMBER ANYMORE, PARTLY, IN  
4 GOOD PART, THAT WAS MY OWN DECISION. I DID HAVE INJURIES THAT  
5 WERE GOING TO TAKE SOME TIME TO HEAL. BROKEN BONES TAKE TIME  
6 TO HEAL. THE SQUADRON NEEDED NURSES WHO WERE ABLE TO FLY, SO  
7 I CHOSE TO GIVE UP MY ASSIGNMENT. ALSO, WHILE I WAS ON  
8 CONVALESCENT LEAVE, AND RECOOPERATING FROM MY INJURIES, I GOT  
9 PREGNANT, AND THAT DEFINITELY RULED OUT ANYMORE FLYING AS A  
10 CREW MEMBER.

11 MR. CONNORS: THANK YOU. I HAVE NO FURTHER  
12 QUESTIONS.

13 MR. MCMANUS: I HAVE JUST TWO OR THREE.

14 RECROSS EXAMINATION

15 BY MR. MCMANUS:

16 Q MRS. AUNE, THERE WERE TWO BABIES TO A SEAT AND  
17 ONLY ONE OXYGEN MASK PER SEAT, ISN'T THAT CORRECT?

18 A CORRECT.

19 Q AND, YOU, IN FACT, DID PUT AN OXYGEN MASK ON AFTER  
20 THE EXPLOSIVE DECOMPRESSION, ISN'T THAT CORRECT?

21 A CORRECT.

22 MR. MCMANUS: I HAVE NO QUESTIONS.

1 MR. CONNORS: I HAVE NO QUESTIONS.

2 OFF TAPE, PLEASE.

3 WE HAD PREVIOUSLY ASKED THAT THE DEPOSITION  
4 EXHIBIT WHICH MRS. AUNE REFERRED TO BE MARKED AS DEFENDANT'S  
5 EXHIBIT D-1210-AUNE. I WILL ASK THE REPORTER TO MARK THAT.

6 [DEFENDANT'S EXHIBIT D-1210-AUNE  
7 WAS MARKED FOR IDENTIFICATION.]

8 MR. MCMANUS: I WANT THE RECORD, THE WRITTEN  
9 RECORD, TO REFLECT THAT IT IS THE INTENTION OF PLAINTIFFS,  
10 AND WE DO SO MOVE AT THIS TIME, THAT THE SWORN STATEMENT OF  
11 REGINA C. AUNE, DATED 5 MAY 1975, BE INTRODUCED INTO THE  
12 RECORD AS EVIDENCE AT THIS TIME AS WELL AS THE PHOTOS. I  
13 DON'T BELIEVE YOU MOVED THOSE IN, EITHER.

14 MR. CONNORS: IT IS OUR INTENTION TO DO THAT  
15 BEFORE THE COURT RATHER THAN ON THIS RECORD.

16 MR. MCMANUS: WE WON'T HAVE ANY DISAGREEMENT THEN.

17 [THE DEPOSITION WAS CONCLUDED AT 1:08 P. M.]

1 MR. CONNORS: I HAVE NO QUESTIONS.

2 OFF TAPE, PLEASE.

3 WE HAD PREVIOUSLY ASKED THAT THE DEPOSITION  
4 EXHIBIT WHICH MRS. AUNE REFERRED TO BE MARKED AS DEFENDANT'S  
5 EXHIBIT D-1210-AUNE. I WILL ASK THE REPORTER TO MARK THAT.

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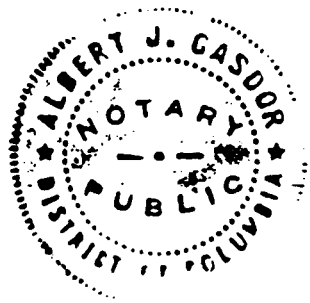
14 MR. CONNORS: IT IS OUR INTENTION TO DO THAT  
15 BEFORE THE COURT RATHER THAN ON THIS RECORD.

16 MR. MCMANUS: WE WON'T HAVE ANY DISAGREEMENT THEN.

17 [THE DEPOSITION WAS CONCLUDED AT 1:08 P.M.]

UNITED STATES OF AMERICA )  
 ) ss.  
DISTRICT OF COLUMBIA )

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my  
notarial seal this 31<sup>st</sup> day of March, 1982



Albert J. Gasdor  
Albert J. Gasdor

July 31, 1985

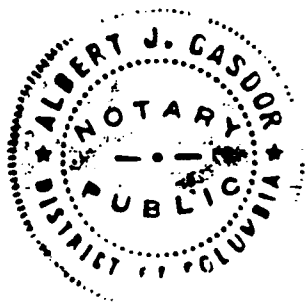
CERTIFICATE OF NOTARY PUBLIC/REPORTER

UNITED STATES OF AMERICA )  
 ) ss.  
DISTRICT OF COLUMBIA )

I, ALBERT J. GASDOR, a Notary Public in and for the District of Columbia, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness is a true and accurate transcription of the stenographic notes taken by me and thereafter reduced to written form by me and/or under my direction and supervision.

I further certify that I am neither counsel for, related to, nor employed by any of the parties to this action in which this deposition was taken; and, further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of this litigation.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my  
notarial seal this 31<sup>st</sup> day of March, 1982



Albert J. Gasdor  
Albert J. Gasdor  
Notary Public in and for  
the District of Columbia

My Commission expires:

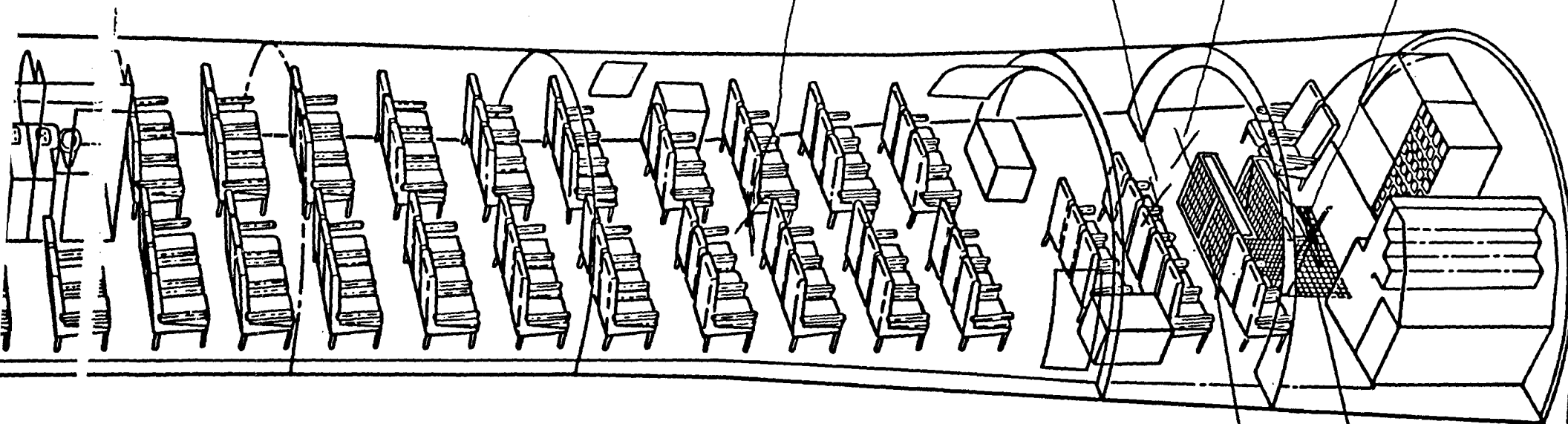
July 31, 1985

Location at time  
roop compartment  
stopped movement

Location at  
time of first  
Impact

Assisting  
crewmember

Location  
of RD



05AM-4 MASTER

40" x 64" GR

WIRE MESH ENCL  
40" x 64" STAIR-W

Aune Leys Ex. D1210-AUNE  
3-9-82  
A. J. Jones.