BRIAN L. WOODS Volume 1 NLFIC vs CARMAN

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- 1 Is this some type of release compound or
- 2 something?
- 3 A That's bottom paint.
- 4 Q Ten is?
- 5 A Pardon me?
- 6 Q Ten would be bottom paint?
- 7 A The black?
- 8 Q Yeah.
- 9 A Is paint.
- 10 Q Why would you have bottom paint on
- 11 this epoxy plug?
- 12 A Because that was -- this was -- okay,
- 13 first I drill a 5-inch hole saw.
- 14 Q Yeah.
- 15 A I only drill through the inner
- 16 fiberglass of the hull and the core. I don't go
- 17 all the way through.
- 18 Q Except for the --
- 19 A Except for the --
- 20 Q -- pilot?
- 21 A -- except for the pilot bit.
- 22 Q Okay.
- 23 A So the 5-inch hole saw drills through
- 24 the inner fiberglass, it drills through the
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- 1 mahogany core --
- 2 Q Yeah.
- A -- and then I stop drilling. I take a
- 4 chisel and I chisel that piece out. That leaves
- 5 just fiberglass that looks like this
 - (indicating).
- 7 Q I see.
- Then I grind back the raw edge of the
- 9 mahogany. I then fiberglass over the mahogany
- 10 and to this piece here (indicating).
- 11 Q Yeah.
- 12 A That cures, then I still have my
- 13 center hole for my pilot, then I drill a
- 14 2-inch -- which this size is -- hole saw through
- 15 the new fiberglass which I just put in which is
- 16 cured and the old fiberglass which is this
- showing the bottom paint --
- 8 Q Okay.
- 19 A -- okay, which is now all one piece,
- 20 and the thru-hull fitting is now through solid
- 21 fiberglass, and the mahogany core is encapsulated
- 22 to the rest of the boat and cannot get wet
- 23 through this fitting.
 - All of the thru-hulls that I put into

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 this boat are done that specific way which I was
- this boat are done that specific way which I wa
- 2 showing you in Exhibit 3I with the upper
- 3 right-hand corner thru-hull fitting --
- 1 Q Yeah.
 - A -- which shows a 2-inch bronze
- 6 thru-hull fitting for the intake for the engine
- 7 which is, by the way, a double thru-hull which
- 8 you can see below it another knot, which if
- 9 Nathan Carman decided he wanted to use a washdown
- 10 pump, he could use this same thru-hull fitting,
- 1 pull two inlets off of it --
- 12 Q Yeah.

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- A -- with one petcock valve.
- 14 Q Is a petcock a check valve?
 - A No, it's a petcock.
 - Q Or what is it?
- 17 A It's a valve, it's a bronze valve.
 - Q Okay. And in Exhibit -- again, I'm
- 19 referring to Exhibit 3 --
 - A 31.
- 21 Q -- 3I, is this red stuff you see sort
- 22 of behind this fitting in the upper right-hand
- 23 corner, is that that epoxy -- what's left over of
- that epoxy core that you referred to that you
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- I drill through, you --
- A No, that's like just a smooth --
- 3 that's to smooth out the roughness so that the
- 4 bronze fitting has a nice smooth fitting to --
- bronze mang has a flice smooth mang to
- 5 smooth surface to attach to.
- 6 Q Okay.
- 7 A It's resin or -- or -- you know, it's
- 8 fiberglass, but resin.
- 9 Q But it looks like -- it looks to me
- 10 first to be that it looked to be a circle which
- 11 is partially blocked by the fitting in the upper
- 12 right-hand corner of Exhibit 3I, okay?
 - A Well, it's solid fiberglass.
- 14 Q Correct. And it looks to be different
- 15 material between the reddish material on one side
- 6 of the circle and the beige'ish material on the
- 17 other, and I was wondering, is this this hockey
- 8 puck of fiberglass and resin through which you
- 19 drill your thru-hull?
 - A It could very well be. Sometimes
- 21 resin takes different colors depending on how you
- 22 mix the resin together.
- 23/ Q Oh, I see what you're saying. I
 - wasn't focusing on the color, I was focusing on



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