DAY 17.

FATAL ACCIDENT AND SUDDEN DEATHS INQUIRY
(SCOTLAND) ACT, 1976.

REPORT OF PROCEEDINGS

into the

LOCKERBIE AIR DISASTER

before

JOHN S. MOWAT, Esq., Q.C.,
Sheriff Principal of South Strathclyde,
Dumfries and Galloway

within

Easterbrook Hall, Crichton Royal Hospital,
Dumfries, Scotland

on

MONDAY, 29th OCTOBER, 1990.

........

APPEARING:— THE LORD ADVOCATE (THE RT. HON. THE
LORD FRASER OF CARMYLIE, Q.C.), with
MR. ANDREW R. HARDIE, Q.C., Advocate
Depute, and MISS FRANCES J. McMENAMIN,
Advocate, for the Crown.

...........

(David B. Healy, Ian Gilkison and
Christina E. Greenhill, shorthand
writers, sworn).

...........

CROWN COPYRIGHT.
MR. B. GILL, Q.C., and Mr. C.M. CAMPBELL, Q.C., for the Lockerbie Air Disaster Group;


MR. J.A. BAIRD, Advocate, for Mrs. Mouna Abdallah, mother of Khaled Nazier Jaafar;

MR. F. ROSENKRANZ, husband of Marie Nieves Larracoechea;

MR. P. ANDERSON, Solicitor, Edinburgh, and MR. M. WOOD, Solicitor, Edinburgh, for Pan American World Airways Incorporated, Etc.;

MR. G.N.H. EMSLIE, Q.C., and Mr. M.C.N. Scott, Advocate, for the British Airports Authority;

MR. J.N. WRIGHT, Advocate, for the Civil Aviation Authority;

MR. C.N. McEACHRAN, Q.C., and MR. R.A. DUNLOP, Q.C., for the Department of Transport;

MR. H.R. DONALD, Solicitor, Edinburgh, for Hull War Risk Insurers.
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TARLOCHAN SINGH SAHOTA, (40), Sworn,

EXAMINED BY MR. HARDIE: I live at 34 Masefield Avenue, Southall.

Have you been employed by Pan Am as a loader/driver at Heathrow Airport for some considerable time? - Yes, sir.

How long have you been so employed? - It is over 12 years.

Since 1st September, 1988 have you been loader/driver No. 1? - Yes, sir.

What are the duties of No. 1 loader/driver? - Just to organise the area, and as assistant to the supervisor, to run the whole build-up areas and interline and the arrival area.

Who is your supervisor? - Peter Walker was, and Tom James.

Now, were you on duty on 21st December, 1988? - Yes, sir.

When did you start work that day? - I don't remember, sir, now.

Can/
Can you remember being in the baggage build-up area at some point that day? - Yes, sir.

Can you recall what time you worked there? - I was on late shift that day, sir, and I start at 2 o'clock, half-past 2; I can't remember the actual times.

Were you No. 1 loader/driver working the late shift in the baggage build-up area? - Yes, sir.

And I think before that you had been working overtime helping out as a loader; is that right? - Yes, sir.

Was the supervisor that day in the build-up area Mr. Peter Walker? - Yes, sir.

As far as the loaders were concerned on the late shift were they Mr. Balwant Singh Sidhu, Amarjit Singh Sidhu, Talwinder Singh Kainth and Jamail Singh Gill? - Yes, sir.

Was that shift dealing with baggage for Flight PA 103? - Yes, sir.

I think we have heard on that afternoon the pier that was being used was No. 7 and 8, the end spurs; is that right? - Yes.

When did the baggage for PA 103 start to/
2370  T.S. Sahota

to arrive? - Just after 2 o'clock, sir.

Do you recall when most of it arrived?
- It is after 4 o'clock, sir.

I think you have heard you had separate containers or tins for different classes of luggage; is that right? - Yes, sir.

Would you look at Production 157?

Do you know what that is? - Yes, these are the containers, they are called, and that shows all the containers we build up.

This is the build up of containers for that flight; is that right? - Yes, for the DHL baggage and the interline baggage.

I think we have heard that another witness actually fitted these together; is that right? - Yes, sir.

Looking at it can you tell from there where the luggage from the connecting flight from Frankfurt went? - It is AVE 4041, sir.

We will come back to that luggage later on.

Apart/
Apart from filling out these luggage build-up cards would somebody else fill in identification cards for each of the containers?
- Yes sir.

Are these attached to the containers, these identification cards, before the container is despatched?
- Yes sir.

Now, at some stage that afternoon did you see Mr. Bedford?
- Yes sir.

Can you remember when that was approximately?
- Round about 5 o'clock.

Where was it you saw Mr. Bedford?
- In the build-up place.

Do you know where he was working?
- Yes, he was in the Interline area in the morning.

What was he doing at the build-up place when you saw him?
- Yes sir; he brought containers to the supervisor.

You say he brought containers to the supervisor. How many containers did he bring to the supervisor's office?
- I believe he brought only one.

Did he speak to you or did you speak to him at that time?
- Only just to say bye-bye.

Did he say anything else apart from saying/
saying goodbye to you? - No.

Did you see the container that he had brought to the supervisor's office? - Yes sir.

And at that time when you saw it can you tell us whether the curtain of the container was open or shut? - I don't remember, sir.

At that time did you look into the container to see what was in it? - Yes sir.

What was in it? - Only five or six baggage.

Can you recall how that baggage was distributed in the container? - I don't remember.

In particular can you remember if any of the baggage had got on to the second level? - No sir.

What does that mean? - All were flat and a couple of bags were just standing.

Do I take it that your second-last answer means that none of the baggage you saw had got to the second level? - Yes, I don't remember actually, sir.

Well, we will come back to that later on. Are you able to describe any of the baggage that was in the container that you saw? - I don't remember, sir.

Now,
Now, would there have been any reason for you to look into this container that Mr. Bedford had brought? — No, because it is my job to make sure all the containers or any containers to make sure about baggage, any left behind from any other flight.

Can I ask you this; on this flight is it quite normal to load luggage or baggage from the Frankfurt connecting flight into containers so that they can go on to New York? — It depends on the number of baggage; if the container in the Interline already full up then container still be sent straight to the flight and we start new container for any in-bound flight from Frankfurt.

If the Interline container is full it is loaded on to the plane and another container is available for the Frankfurt flight? — Yes.

When this Interline container is sent at that stage is it practice that it is used for Frankfurt luggage? — Yes, it depends on the luggage on the aircraft. If there is enough space to put an extra container in the aircraft we make one spare container.

Are you saying there is no set practice and you determine whether there is room for a spare?
spare container or not? - Yes.

Do you know what the position on the 21st December was? Was it decided to use Mr. Bedford's container for the Frankfurt luggage? - Yes sir.

Presumably before making use of Mr. Bedford's container for the Frankfurt luggage you would have to be satisfied that there was plenty room in the container? - Yes.

Did you satisfy yourself that there was plenty room in the Mr. Bedford's container? - Because Load Control advised us to use that container because there was many, a couple of bags coming up.

Who works in Load Control? - It is a different department.

Can you remember who it was in Load Control told you to use this container? - I don't remember, sir.

We will come back to that. Did you become aware at some point that PA 103A had arrived from Frankfurt? - Yes, Peter Walker told me.

What time would that be? - About quarter to six.

What did you do once you got that call? - Peter Walker informed me.

Did/
Did you do anything about it?  - Then I ask Mr. Amarjit Sidhu to take that container, fill up with the bags coming from Frankfurt in the container.

You told Mr. Amarjit Sidhu to take that, Mr. Bedford's container, out to the flight?  - Yes.

And to fill up that container with the Frankfurt luggage?  - Yes sir.

Did you have anything to do with the loading of the Frankfurt luggage into the container or was that done by others?  - It depends on the manpower in the baggage hall.

That day you sent out Mr. Amarjit Sidhu to take the container out of the Frankfurt flight?  - Yes sir.

Did you go out with him or did you stay in......?  - I stayed in the baggage hall.

Were there other duties still to be performed in the baggage hall at that time?  - Yes.

What were those?  - To looking for any other late bags coming from the check-in and to cover the Interline area and to send somebody to make sure that any bags left behind were there.

Was/
Was that to make that there were no bags left behind? - Yes.

Did you also have to arrange for the courier containers to be sent out to the plane? - Well, that was already done by the supervisor.

That had been done by that time? - Yes, because he was in the office.

Just after the courier luggage had gone out to the plane did you receive a phone call in the office? - Yes.

Who was that from? - I don't remember, sir, now.

Can you remember what it was about?

- About DHL containers, how many they coming up there.

Apart from that phone call did you receive any other phone calls about baggage in the Interline area? - I don't remember, sir.

Did/
Did you send anyone to the interline area? - Yes, sir.

Who did you send? - Jamail Singh Gill.

What was the purpose in sending him to the interline area? - To make sure if there is any more bag for Flight 103, sir.

Now, after he had gone did some more bags arrive at the build-up area? - Yes, sir.

How many? - I don't remember, sir.

What did you do with these bags which arrived after he had gone? - About half-past 5 we sent all the baggage build-up containers for the aircraft, and after that I remember I sent a couple of late bags to Flight 103.

By "a couple" do you mean two or.....? - Two, sir.

When you say you sent as couple of late bags out to the flight, who did you give them to take out? - I remember last two bags I give to Mr. Jamail Singh Gill, and one security man was sitting in his tug that was going on the road, and I just stopped that, because build-up is on the way was to the aircraft, and I give him last two bags.

Mr./
Mr. Gill had been on a tug along with a security man, and you stopped him and gave him these two extra bags?  -  Yes.

BY THE COURT:  I take it he was on his way from the interline terminal?  -  Yes, sir, he was from interline to the Flight 103, sir.

EXAMINATION CONTINUED BY MR. HARDIE:

After you gave Mr. Gill these two bags what happened next?  -  He took those bags to the aircraft.

Can you remember if the security man was Mr. Kamboj?  -  Yes, sir.

Now, I think after that you returned to Mr. Walker's office and told him that the operation was completed; is that right?  -  Yes.

And when the loaders returned from the aircraft to the build-up area did you tell them they could go off duty with the exception of one person, who was to stay to help you with the loading of the last flight to Frankfurt?  -  I don't remember, sir.

When you were working in the build-up area on 21st December did you see anything suspicious?  -  No, sir.

Did you see anyone acting suspiciously?  -  No, sir.

Now,
Now, I think before you started your late shift you indicated you had helped out by working overtime was a loader; is that right? - Yes, sir.

Where was it you helped out? - I don't remember, sir, no.

Do you remember at any time being in the interline shed or area? - I don't remember, sir.

Now, that day was any baggage placed from the build-up area into the interline container which had been left by Mr. Bedford, as far as you know? - Yes, sir. Only one container which he brought up; that is the only one from interline.

I am sorry, I think it is the way I put the question. You told us Mr. Bedford brought one container to the baggage build-up area or to the front of the supervisor's office, from interline? - No, it was done by Mr. Peter Walker, sir, the supervisor.

Oh, can we go back a bit? You mentioned Mr. Bedford going off duty? - No, the supervisor, Mr. Peter Walker, sent him home, sir; not me.

I think we are at cross-purposes, Mr. Sahota; it is my fault. Mr. Bedford brought the/
the container from interline to a point in front of the supervisor's office; is that right? - Yes, sir.

After that container arrived there did you put any luggage into it from the build-up area? - No, sir.

Did anybody as far as you know put any luggage into it from the build-up area? - No one, sir.

Are you satisfied that when the container went out to the Frankfurt plane it contained only…? - Five or six bags; that is what I remember now, sir.

Yes: and it was in the same position or state as it had been when it arrived? - Yes, sir.

In the baggage build-up area would there be any people other than Pan Am employees who were carrying baggage? - No, sir.

I wonder if you would look at Production 42, Photograph 1. Now, do you remember that on the 24th January, 1989 you were in the baggage build-up area at the rear of Terminal 3 when some police officers asked you to do something? - Yes, sir; I think I remember that.

What/
What was it that they asked you to do?
- Only just to make, if I remember any baggage I saw on 21st December, and those days in January I remembered the baggage brought from the interline area to the build-up, the bags were lying like that, sir.

So you were asked generally if you could remember how the bags had been loaded in the container which came from the interline area; is that right? - Yes, sir.

Did you then put bags into a container as is shown in Photograph 1? - I don't remember, sir, no.

Did you put bags into the container to try to show the police? - Yes, sir, I think I remember that.

And did somebody photograph that? - Yes, sir.

Looking at that photograph, can you recall now how the baggage was loaded when you first saw the container outside the supervisor's office? - Yes, sir; I think the bags that day were like as it is now in the container.

And what we see is I think about five bags standing upright at the back on the floor of/
of the container and two bags lying at the front of the container, again on the floor; is that right? - Yes, sir.

So we see from that that there is no second layer of luggage; is that right? - Yes, sir.

And is that how you recall it now? - Yes, sir.

Have you ever been involved -- I am not now speaking about 21st December -- in loading a partially filled container with luggage from a connecting flight? - I don't remember, sir.

BY MR. CAMPBELL: Mr. Sahota, just a few questions, if I may. Could you look again at the photograph we were looking at, Production 42, Photograph No. 1. I think you told us earlier on in your evidence that you have a recollection of seeing five or six bags in the container 4041 on the 21st December when it was outside the supervisor's office: do you remember saying that? - Yes, sir.

Now, just so I am clear about that, if you look at the baggage as it is loaded in the container shown in the photograph, was this simply intended by you to give a general indication of your/
December, and the bags were lying like that. That is what I remember when the policeman ask me if I remember anything on that day in January, sir.

I am just wondering how clear your recollection is about the detail of what you saw on that occasion. We can see in this photograph bags along the back of the container and a couple of bags on the floor at the front: correct?

- Yes.

Now, do you have any clear recollection of how many bags were standing upright along the back of the container? - I don't remember, sir.

So it might have been four bags, it might have been five bags, it might have been three bags; is that the best you can do? This is not a criticism of you, but I want to be clear? - Well, it depends on the size of the baggage.

You have no recollection as to how many bags were along the rear of the container; is that right? - As I said at the very beginning, roughly five or six baggage, sir.

For example, we can see towards the left of the rear of the container a black holdall sitting in the angle: do you see that? - Yes, sir.

We/
We have heard evidence from Mr. Bedford to the effect that no luggage was put in the slanted area. Are you in a position to contradict that?
- No, I don't remember about that, sir.

One thing which does appear from the photographs is there was no second layer of luggage. Do you have any recollection that there was no second layer of luggage? - Yes sir; there was no' any second.

BY MR. BAIRD: Mr. Sahota, when you told Mr. Amarjit Sidhu to take the Interline container out to the incoming flight from Frankfurt did you tell him that what he was to do was fill up the container with luggage from Frankfurt? - Yes.

Thereafter did you tell him that he was to take that container straight to Flight 103?
- Yes.

When I say straight to Flight 103 does that mean once it was loaded with baggage which came off the Frankfurt plane it was to be towed straight across to Flight 103? - Yes.

It did not go anywhere else in between?
- No.

Nothing else happened to the container than in fact it was to be taken straight from Flight/
Flight 103A the Frankfurt plane across to Flight 103; is that correct? - Yes sir.

No re-examination.

AMARJIT SINGH SIDHU (41), Sworn:

EXAMINED BY MR. HARDIE: I live at 16 Ashford Avenue, Hayes, Middlesex.

Are you employed as a loader and a driver by Pan Am working at Heathrow Airport? - Yes sir.

How long have you been working in that capacity? - 11 years.

Were you working at Heathrow on the 21st December, 1988? - I was.

Can you remember what time you started working that day? - Not actually; I was originally on the late shift from 2 o'clock to 10 or half past ten.

And where were you working when you were working on the late shift? - I was working on the build-up area.

Is that the baggage build-up area? - Yes.

Was Mr. Sahota, the previous witness, the/
the No. 1 loader? — He was.

Now, at that time were working at the end spur which is No. 7 and 8? — That's correct.

Now, at some point that afternoon did Mr. Sahota ask you to do something in respect of a container? — Yes, it was about a quarter to six when he asked me to take the Interline container to a 727 which was coming on K16.

Where did you collect that Interline container? — It was in the build-up area in front of the baggage build-up office.

Is that the supervisor's office? — Yes.

And to take that out did you take a tug to the container or was there a tug already attached to the container? — The tug was already connected to the container.

And when you got to the tug and the container did you look to see what was in the container? — Yes, I had a quick glance before I put the curtain down on the container.

Do I take it from that the curtain was still up, still open? — Yes.

When you had a quick glance what did you see inside? — I seen about six or seven bags./
bags.

And can you recall how they were distributed in the container? - As far as I can remember I seen some bags, four or five bags, standing up at the back and two laid down flat in the front.

I wonder if you would have a look at photograph Production 42 and photograph No. 1. You will see there five bags standing up at the back and two lying down at the front and a holdall. Leaving aside the holdall just now the four or five bags standing up and the two lying down -- would that be similar to the cases we see in photograph 1, that is, five standing up and two lying at the front? - Something similar.

In particular was there only one layer of luggage when you looked in; there were no cases on top of each other? - Not as far as I can remember, no.

I wonder if you can help us a little more. Can you remember anything about the cases which were lying down in the container and what sort of containers they would be -- similar to the two cases you see in photograph 1, the one towards the angled area -- can you remember any particular details of those cases? - No, not really;
really; only the two at the front I think were quite wide -- they covered the base of the front container.

You thought they were.........?  

They were quite big bags.

Did you say there was something about them being light?  - No.

Did you say they were wide?  - I did not see white; I think they were dark.

Were you joined by anybody else when you collected this tug and container?  - No, I was not.

Did anybody join you once you got out to the aircraft?  - Only when I reached the aircraft and started loading.

Who joined you?  - It was Dave (sic) Sandhu.

Is that Tarshan Singh Sandhu?  - Yes.

You call him Sandy?  - I call him Sandy, yes.

Did you and he assist in unloading the 727?  - Yes, we loaded that container.

When you say you loaded the container can you tell us how the 727, the incoming flight from Frankfurt, was unloaded?  What happened? How/
How did you go about that? - Well, when the aircraft came in one of the loaders drove the rocket to the aircraft and I drove my tug and container and the right side of the rocket -- I was on one side and Dave Sandhu was on the other side and as the bags was coming along we were just putting one by one in the container.

Do I take it there were other loaders in the hold of the aircraft who were taking the cases from somewhere in the hold and putting them on to the rocket? - I don't know about that. Of course there were people but I don't know who they were.

And as cases were coming down the rocket you and Sandy were on either side of the rocket; is that right? - Yes.

And you were taking out cases as they came down and putting them into the container? - Yes.

And this is the container you had driven out to the aircraft? - Yes.

Did you rearrange the cases which had originally been in the container? - No I did not.

Did you take any of them out and put them/
them on a different level or anything like that?
- No, I didn't because I was quite satisfied
  they were loaded.

  You were satisfied about the way they
  were loaded? - Yes.

Do you know if Sandy rearranged the
cases in the container before putting the cases
from the plane into it? - As far as I can remember
no.

  Did all the luggage from the aircraft
go into the container? - Apart from about seven
  or eight bags left on the rocket. They didn't
  fit in the container.

  So you had seven or eight bags left
  over? - It could have been more.

  Once the container was full what was
done as far as the container is concerned? -
  I locked up the container, drove this tug to
  the next door which was K14, to the 747.

  You drove it on to the stand K14 to
  the 747 which is PA 103? - Yes.

  When you got to the 747 what happened
to your container? - As I drove to the plane
  there was one of the loaders pointed me to the
  tug and I drove his tug away and left my tug and
  container with them.

  Did/
hard or soft? - No, I can't remember.

Now, you said that when you picked up the container at the baggage build-up area it was near the supervisor's office; is that right?
- Yes, it was.

How close to the supervisor's office was it? - About 10 to 15 ft.

Is there a window in the office near where the container was parked? - Yes, there was, and still is.

Is there also a British Airport's Authority Security Office which is near there? - It is next door, yes.

Are there windows in that office as well? - There is a window, yes.

Would that window look out on to where the container was? - Quite clearly, yes.

Is that security office manned 24 hours a day? - That is right.

Could I just ask you when you were loading the container from the luggage which was coming off the rocket can you tell me whether you placed the luggage which came off the rocket, whether you placed it first as the second layer, or did you put stuff down on the tarmac to get suitable cases/
cases, or how did you go about it? — The second layer at the back of the container I filled first.

Looking at the photograph which is still on the screen, Production 42, Photograph 1, just assuming the back layer was as shown in the photograph, with the cases standing upright, how would you create your second layer at the back? Would the cases be upright, or across, or what? — The cases would be flat.

And once you had created your second layer at the back would you then create your second layer at the front? — It depends on the size of the bags. If they are too heavy bags or big bags we can put it in the front of the container; is not, try to fill the back of the container first, right to the top.

So if we were looking to a bag which was on the second layer lying flat on top of the front bag we see in Photograph 1, do I understand that that might be like that unless you get a particularly heavy bag? — It depends on how they come.

I think you told us you were standing on either side of the rocket, taking luggage off as it came down; is that right? — Yes.

And/
And as soon as it came down did you pick up the baggage from the rocket and place it in the container or did you put it down to wait till you had a collection on the tarmac? Placed it as it came along straight into the container.

Was Sandy doing that as well? Yes.

Did each of you have a particular part of the container to look after? Looking at the photograph, if we divided the container vertically, would one of you deal with the right-hand side of the imaginary division line and the other one deal with the left-hand side? How did you go about it? No, not all the time; we were working both together.

The crew wouldn't know whether you or Sandy loaded the left-hand side of the container as you look at it or the right-hand side? No.

Now, again before you put in all the Frankfurt luggage into the container can you tell us whether the entire base of the container was covered with luggage? It was, yes.

Do/
Do you recall a particularly heavy suitcase coming down the rocket at any particular time? - I can't remember.

You see, if Mr. Sandhu, or Sandy, recalled a heavy suitcase that you dropped and both of you required to lift into the container, would that....? - Maybe, I don't remember it.

Can you recall any Samsonite-type suitcases? - No, I can't.

I take it your concern is to get the stuff off the rocket into the container and loaded as safely and quickly as possible; is that right? - Yes, that is right.

BY MR. CAMPBELL: You told us the first thing you did with container 4041 was to pull the curtain down and secure the curtain; is that right? - Yes.

You then took the container over to the 727 for loading with baggage coming down within the 727; is that right? - Yes.

After you and your colleague had finished loading the tin did you secure the curtain again? - That is correct; that is the first thing I did.

Would I be right in thinking that during that/
that period of time, that is from when you first pulled the curtain down to when you pulled the curtain down again after finishing loading the tin, during that period of time the container was under your observation and under your control?
- All the time, yes.

During that period of time were the only people to put bags into the tin yourself and your colleague Mr. Sandhu? - That is correct.

Am I right in saying that during that period of time the only bags that were put into the tin were those bags coming down from the 727, that is the Frankfurt flight? - That is correct.

I take it those were all bags destined for America? - They were.

That afternoon did you notice anything unusual or suspicious happening? - No.

Did you see anyone acting suspiciously? - No, I didn't.

How long did you have to carry out this loading procedure? Was there any degree or urgency in the sense that you wanted to load the tin reasonably quickly if you could to get it across to the 747? - We had to get it done as safely and quickly as possible to get it to the 747 so it could leave on time, 6 o'clock.

Is there any set pattern you followed to load the 747? - No.

I think in your evidence-in-chief in relation to questions from the learned Advocate Depute you said it simply depends how they come: do you remember saying that? - Yes, that is correct.

It/
It must be very difficult for you to think back to the details of this as it happened so long ago on the 21st December. Am I right? - Yes.

Do you now have any recollection as to where in the tin you placed the first bags? - I wouldn't.

If I was to ask you where you placed the fifth, sixth or seventh bags do you have any recollection of that? - I would not.

How many bags altogether would the tin contain? - 40 or 50 bags but again it depends on the size. It could be more.

I didn't catch the number. Did you say 50? - 40 or 50.

Do you recall anything about the bags as they came down off the 727, the bags which had to be loaded into the tin. If there anything else about them which sticks in your mind? - Nothing.

Did you pay attention to the baggage tags on each case as they came down? - As they were coming down you are supposed to read the destination and see if all area American destinations. Your concern was to check the tags to make/
make sure they all had American destinations?
- And are marked with Pan Am 103.

Did you pay attention to anything else in relation to the baggage tags? For example, did you pay attention to whether the bag was initiated with Pan Am flights or whether it started off with another carrier's flights -- Lufthansa or whatever? - It was not my attention. You did not pay any attention to that.

I think you were asked certain questions as to your recollection of the two bags lying flat at the front of the tin. At the time when you first started to handle the tin, that is the Interline bags Mr. Bedford put into the container, if you think of the two front bags for a moment -- and to be clear which ones we are talking about if you look back at the photograph in Production 42, No. 1, I am talking about the two bags lying on their side at the front of the tin. You were asked if you could remember anything about the colouring of them and I think you said you couldn't, but do you recall saying at any time that you had a recollection of them being black suitcases? - I was not really looking for the colour. I was just having a quick glance as I/
I put the curtain down. Maybe I said they were dark cases, dark-coloured cases. I cannot remember really now.

Do you remember giving a statement to a police officer Ronald Knox on the 1st January, 1989? I daresay you have given many statements? - I have given so many statements I do not know which one.

Assuming you did give that officer such a statement, do you remember saying to him that you seemed to recall that there were two large black suitcases lying flat in the front section of the container? - I might have said that.

If you did say that is it likely your recollection then would be better than it is now? - It could be, yes, because it has been two years.

BY MR. KREINDLER: Mr. Sidhu, you first saw the bags in the tin in the build-up area; is that right? - Yes.

Then you moved the tin over to the 727? - Yes, I drove down.

And then you saw the bags in the tin again when you were in the area of the 727? - Yes.

And the bags I take it refers to those bags/
bags that you had originally seen at the build-up area which were still in the same position when you got over to the area of the 727 as they had been in the build-up area? - I think they were.

With respect to the two flat bags in the front of the container lying flat on the floor do you recall if they were large heavy bags or small bags? - I didn't feel (sic) them because from looking at them I would say they were quite large bags and probably a bit heavy because they were big in size.

You think they were big in size? - Yes.

You know what a hard-sided Samsonite bag looks like, do you? - I take it........

Was either one of these hard-sided Samsonite?

- I don't remember.

At the time when you arrived at the 727 was the rocket in place? - Once I reached there the aircraft was just about near on the blocks and once the driver drove the rocket to the aircraft we pulled the container in.

So you were actually at the 727 when the rocket had been pushed up or pulled up at the aircraft? - Yes.

Were/
Were you there when the first bags started to come down the rocket? - I don't realise the question.

Was it you or Mr. Sandhu who took the first bags from the rocket and placed them in the tin? - That's right.

So that the first bags off the 727 were placed by you and Mr. Sandhu in the tin? - That is right.

They were placed on top of the other bags that were then in the tin? - Yes.

All of them were then in the same position as they had been when you towed the tin over to that area? - I don't get that question?

When you took the first bags from the rocket and placed them in the tin I take it the bags that had been there were still in the same position you had observed them in? - Yes.

BY MR. GILMAN: Mr. Sidhu, I would like you to go back to this day in December, 21st, 1988 and see if you remember how you picked the bags you took off the rocket on the 727 on to the Interline container. Can you remember how you did that? - I cannot remember.

Did you take them flat or did you take them/
them standing upright?  - At the back to start
with I laid them flat.

What about at the front of the ones
you took off?  - It depends on the size.

Do you remember how you took them?
- No I cannot.

Would it be your normal procedure to
take them flat?  - Yes, it would be.

When you closed up the container that
you had taken out, the one that had the Interline
baggage from the Interline shed, was that container
full when you closed it up for the last time?
- It was full up right to the top almost.

Would that be approximately 700 kilos?
- It would be 700 kilos full.

MR. CAMPBELL:  I may have raised one
matter in cross-examination which if it is not
cleared up there may be a danger of misleading
somebody and I wonder if I could just ask one
further question and clear it up.

THE SHERIFF PRINCIPAL:  Very well.

BY MR. CAMPBELL:  I take it if you
recollect giving a statement to a police officer
in which you described the two front suitcases
as being large black suitcases, do you remember
giving/
giving a later statement to a Detective Sergeant Russell on the 13th February, 1990 when you went back to this subject and he asked you about it? - I probably did, but I cannot remember.

Just for completeness so that nobody is misled, least of all yourself did you say to that officer on that occasion when you were asked to clarify the point about the description of the two cases lying flat at the front "I have previously referred to them as black but really I should have said dark-coloured because I didn't pay any particular attention to them". Do you recollect saying that? - I probably did say that but again I still can't recollect.

To be fair to you the evidence which you gave to the police as that these cases as far as you can recollect were dark-coloured. Is that fair? - That's right.

And today you have no recollection of the matter? - No, I cannot remember because I have no attention to the colour. My attention was to the container.

BY MR. BAIRD: Do you remember when the first gentleman asked you questions about the cases you took off the Frankfurt plane he asked/
asked you if you remembered amongst other things a Samsonite type of suitcase and you said no, you can't remember. Is that right? - That is correct.

What did you understand him to mean by saying "Samsonite type suitcase"? - An ordinary Samsonite hard case.

Is that what you understood him to mean? - Yes.

Is Samsonite not just a manufacturer of cases? Are they not people who make luggage? It is a make of case, Samsonite? Do you not know that? - I perhaps did not get the question right.

That is what I am wondering and just to make sure there is no confusion when the expression Samsonite case is used did you understand by that a hard-sided case? - That is what I understood but they make soft cases as well -- is that what you mean?

Do you know whether they make soft cases as well as hard cases? - I think they do. I don't know.

So be fair when you use the word Samsonite or somebody used the word Samsonite to you what you/
you thought of was a hard-sided case? - Yes, that is what I thought.

But your evidence is still the same today that you can't remember whether any such case came off the Frankfurt plane? - I cannot remember. It could be or it could be not.

BY MS. LARRACOECHA: Mr. Sidhu, once you transferred all the luggage from the 727 to the tin and you locked it what happened after that? - I drove down to the next door, K14.

And then? - I drove down there, left it there and then drove back to the build-up area.

Was it received by somebody at the foot of the 747? - It was a Pan Am loader there and he pointed me to his tug and I drove his tug away and left my tug and the container there.

I missed part of that. He wanted you to do what? - He pointed me to his tug and I took his tug away and left my container and the tug there.

Did you see the container 4019 (sic) being lifted to the 747? - No I did not.

Who was there? How many people were around the 747 at the time when you left the 4019? - I had no attention myself. All my attention was taking the container out and leaving it to the aircraft and drove back.
I see. Now, did the faces around you look familiar, other people, other employees working around? - They did, yes; I knew some of them.

For you to distinguish people from Pan Am you would rely on their cards. You might know some of them, but for example people who had started recently, you wouldn't recognise them; is that correct? Only by the badge? - Only from the uniform and badge.

Okay. So if there had been any intruders who prepared fake ID cards would you have accepted them as a newcomer or a beginner? - That is security's job; I wasn't going too close to check their ID's.

That is what I am trying to get. It would be the job of the BAA security officers to control if those people working are really employed or they have managed to breach security? - That is correct.

Are you aware that there were security breaches after the Pan Am 103 at least three or four times when journalists created fake cards....

THE SHERIFF PRINCIPAL: Ms.Larracochea, I am not concerned about the situation at Heathrow after this disaster; I am only concerned with what/
what happened before the disaster and what precautions might have been taken before it to prevent it.

Ms. LARRACOECHEA: My lord, that is exactly what I am trying to get at, because if after it happened there were three or four successful attempts to break security of British Airport's Authority I don't know how they could control if anybody really set to this bomb attempt, they would probably be able to get through quite easily. I believe, because of the lack of control or concern, that that is what I would like to get to, that employees at Pan Am or Alert, if there was any intruder they would have no way of recognising them.

EXAMINATION CONTINUED BY MS. LARRACOECHEA:

Is that not right? - I don't think that is question for me. I cannot answer that question.

Now, no. The only question for you is, you would just accept anybody with a badge and uniform as an employee? - Not all the time, because we know all the faces: I work with the colleagues.

I understand that, but he could be a newcomer, or he could be an imposter? - I was only/
only supposed to leave the tin, and that is up to security.

I understand that? - Seven, eight people take the flights, obviously if it is somebody else they should know.

I am just questioning you, that you would accept people around you as even perhaps new beginners? - Not all the time.

How would you not accept that? If you see somebody in a uniform with a badge and he says this is his first day.......? - Are you talking about that night?

I am talking in general, when you work? - Not now. You are supposed to challenge.

If you see someone with a new face you are supposed to challenge them and report them?

But we are trying to ascertain what happened prior to December 21st, before December 21st. Can you recall.......? - (No answer).

BY MR. ANDERSON: When you first took up container 4041 with the tug attached would it have been possible to see the curtain for the supervisor's office of Pan Am in the baggage build-up area? - You probably could see the container but I don't think the curtain. The curtain was facing/
facing the opposite way? — That is what I was trying to get at. So it would not have been possible to see the curtain from the supervisor's office, because it was facing the spurs? — That is right.

I wonder if we could ask you a couple of questions about your recollection of the bags that were in container 4041. Firstly, did you pay any particular attention to those bags when you pulled down the curtain? — No, I didn't.

Did you pay any particular attention to them when you lifted the curtain again at the 727? — No, I didn't.

Correct me if I am wrong, but I did understand that when you were answering Mr. Hardie, who was the first gentleman who asked you questions about two or three lying flat on the floor at the front of the container, I noted your answer that you didn't recall if those flat suitcases were of a hard or soft type: do you remember whether you said that? — I probably did say that.

What I really wanted to know from you is the following, because in answer to the first American gentleman, Mr. Kreindler, who asked you
a question I thought I noted you as saying you
didn't think either of the two lying flat was a
hard-sided suitcase. Those two answers do not
appear to me to be immediately the same. Are
you able to say whether the suitcases lying flat
on the floor were either hard or soft types?
- It could be either. I think they were soft
cases.

Do you have any reason for being able
to say that? - As far as I remember of them
they were soft cases: nothing more than that.

If we have heard evidence from other
witnesses that they put a hard-sided suitcase on
the floor lying flat do you think they must be
wrong about that? - I wouldn't say 100 per
cent: they could be right.

If as you were being asked again by
Mr. Hardie a large heavy suitcase came down the
rocket from the 727 where in the container would
you prefer to put that? - Nearest -- the
lowest place I could.

And if for example you had: perhaps
just an average-sized suitcase lying on the floor
at the front do you think it is possible you would
take that off for a minute and replace it with
the/
the large heavy suitcase that you would like to get at the front? - I would do that, yes.

Then you might replace the smaller suitcase on top of the large one? - I would, yes.

BY. MR. EMSLIE: Do you in fact have a recollection of doing any such thing on the 21st December 1988? - I am sorry: can you repeat the question?

It was suggested to you if a big heavy suitcase came down you might jumble up that suitcase with cases which were already in the tin? - I can't remember if I did it or not.

No. Now, you were asked a number of questions about the possibility of imposters with fake ID cards being out there on the tarmac beside the 747: do you remember these questions being asked of you by the lady behind me, Ms. Larracoechea? - Yes.

Would you agree the Pan Am loaders on duty on that aeroplane would know perfectly well whether there was a stranger or imposter in among them that afternoon? - Of course they would know.

There/
There were also security men on duty at the terminal by the plane, were there not?  
- There is supposed to be one.

Would it be part of a security man's duty to make sure that no strangers got in among the baggage and interfered with it?  
- Yes.

Do you know when these security people were out of the plane?  
- I was only there for a few seconds. My main attention was to drive the tin over, hand it over and come back.

Do you know who were the employers of the security people who would be out at the plane?  
- Pan Am Security.

That is Alert?  
- Yes.

RE-EXAMINED BY MR. HARDIE: Can I ask you about the concept of the heavy suitcase coming down the rocket again. As I understand the position, you would want to load a heavy suitcase as near to the bottom as possible: is that what you are saying?  
- I would, obviously. If it is too heavy you don't want to load it too high up or too far.

Can I just ask you about the question of re-arranging suitcases? Did you re-arrange any/
any suitcases on that day? I can't remember.

You see, when I asked earlier questions about that it is noted that you said you didn't re-arrange any suitcases. Can you recall any reason to re-arrange a suitcase on that day?

- Offhand I can't remember. We do it every day and load some of the containers. I don't remember whether I did it or not.

Were you satisfied with the way in which the suitcases had been originally loaded in the container, that is the suitcases which were there when you collected the container? Were you satisfied with the way in which they had been loaded?

- I was.

In that situation would there be any reason for re-arranging them? I don't think I would have done that: that is why I didn't do it.

The other matter I wanted to ask you about is the question of possible imposters.

Now, as far as you were concerned that day did your duties at the aircraft simply relate to the container and loading the container from the Frankfurt plane? That is right.

Now,
Now, I think you have told us that Mr. Sandhu was also involved in loading the container with luggage which came down the rocket; is that right? — That is right; yes.

Was there anyone else involved in that exercise? — Not loading that particular container.

So that if there were any questions of imposters anywhere can we take it that there was no prospect of any imposter or newcomer being involved in putting luggage from the rocket into the container? — No.

And the luggage which came down the rocket was coming directly from the hold of the aircraft; is that right? — It was.

In particular, did anyone on the ground side of the rocket put any luggage on to it before it reached you? — I don't think so.

Is that something you would have seen, given that the rocket was between you and the aircraft? — Obviously we would have seen it, because it is only 8 to 10 ft. apart.

If we look at the position on the ground as far as the luggage on the rocket is concerned that that luggage going into the container, there is no prospect of any newcomer or imposter doing either/
in relation to the container and how you might have loaded the luggage into it. As I understand it, eventually the container was absolutely full, because you had to leave out seven or eight cases which otherwise would have gone into it; is that right? — That is correct.

Now, would you have used the angled bit of the container to put luggage into it in order to fill it up? — Yes, we always do that.

So is it possible that a suitcase would be put in at the front of the angle with part of it resting on the case which was already on the floor of the container and angled into the angle? Is that a possibility? — It could be a possibility.
TERENCE CRABTREE (42) Sworn

EXAMINED BY MR. HARDIE: I reside at 22 Brittams Lane, Chertsey, Surrey.

Are you a loader/driver No. 1? - Yes, sir.

With Pan Am? - I am, sir.

What does the "1" mean? - It basically means the same as a crew chief, you are in charge of the crew when loading or unloading the aircraft.

What were your duties involved in connection with your employment? - What do my duties involve, sir?

Yes? - Basically I have my own crew or possibly other crews and, as I just stated, load or unload an aircraft. I designate different jobs, tasks of work and methods of doing the work.

How long have you been employed by Pan Am as a loader/driver? - Just over eight years, coming up for the ninth year, sir.

Now, were you on duty on the 21st of December 1988? - I was.

And what shift were you working that day? - Well, I was on the early shift but I stayed on for overtime to do four hours' overtime, to do the 103 flight.

Now,
Now, did you receive instructions at some time in the afternoon from the supervisor Mr. Oakes?
- Instructions, sir?
  Yes about Pan Am 103? - Nothing other than normal, no.
  I see. Well, can you confirm the people on your crew were Mr. Barrow, Wilkins, Herbert, Ives, Fisher and Mr. Gaskill? - Yes.
  And are these the people who are all loader/drivers junior in responsibility to you? - You could say that. They are qualified the same as me but they are not in charge, as I am. They are loader/drivers 2, whereas I am loader/driver 1.
  I wonder if you would look at Production No. 118. Now, do you recognise that? - I do, sir.
  What is that? - The original, my original copy of the loading plan, as we call it the Cool Plan, for the 103 on that date.
  Is this document which you received from someone else indicating how the aircraft is to be loaded or is this something that you make up yourself? - No. It is a document that is given to me with the flight and I could possibly make deviations to it but that is given to me by the supervisor, yes./
Can we see that various figures are put in against different locations and, for instance, if we look at 14L, we see 700, B700, 4041; do you see that? - Yes.

Now, does the 4041 refer to the container number? - That ident, yes.

So what does the 700 and the B700 mean? - The 700 is estimated weight, 700 kilograms, and the B is the economy baggage.

Now, on that day, once you had been given this Cool Plan, did you and your crew go on different vehicles to Stand 14 where the Pan Am 103 aircraft was positioned? - That would happen. I don't remember the details but different members of the crew would take different vehicles out, yes, sir.

And can you recall who was on the forward hold and who was on the rear? - To the best of my memory, I am pretty certain I remember Mr. Ives being on the forward hold litter, as we call it, and pretty certain it was Mr. Barrow who was on the rear litter.

And did you then supervise the loading of the aircraft? - Yes, sir.

Now, I think the loading doors of the
747 are on the right-hand side of the aircraft; is that right? - Yes.

Do you remember at some point a tug arriving with a container of transfer passenger baggage from flight PA103A which had arrived from Frankfurt?
- Yes.

Now, where was that container loaded?
- It was in position 14L there as indicated on the Cool Plan, 700 4041 ident -- I beg your pardon -- there.

14L? - That's correct.

Now, was that after it was loaded and was it secured into the hold at that position? - Yes, it would be secured, yes.

Now, I think there were some questions about containers or mail containers which did not arrive, is that right, that day? - I remember that vaguely, a container of cargo I believe did not arrive from the warehouse, sir, yes.

I think you mentioned that on occasions you would deviate from this Cool Plan when loading the aircraft? - That's correct.

Why would you do that? - Well, you have to do because possibly a instance where the cargo might turn up late, you have an allocated space for/
for it and it is nevertheless allocated but if it does not turn up in good time, you have to start loading to get the aircraft loaded so you put the cargo on last and you have to work it out for a time schedule and work to the best of your ability.

Did you adjust the Cool Plan that day as far as container 4041 is concerned? - There wasn't a designated position for 4041, that could have gone anywhere.

Well, when you got the Cool Plan did it say 4041 in position 14L or did you put that on to the Cool Plan? - It does not indicate any identification of baggage containers on the original Cool Plan so I put that in there, yes.

So that when you got the Cool Plan it will simply show that there will be some containers in that position or a container for that position; is that right? - Yes, it normally indicates as you can see, the cargo pallet position. They have to go where indicated due to the weight and balance of the aircraft but baggage is normally at the loaders' crew chiefs' discretion.

Once you put it into that position you or whoever on your crew would write in "4041"? - I would do the writing in, sir.

So/
So can we take it then that on that date there can be no doubt that 4041 was at position 14L? - To my memory, that is exactly the position it was, sir.

Now, can you recall when you went to the aircraft, one of your crew advising you of something in particular? - Yes, I can.

What was it that you were told? - Well, I think you are speaking about the fact that the cargo door was open, the rear cargo door was open.

Yes? - We were approaching the aircraft, that is something which I had mentioned had been brought to my attention in a previous statement by the police in time gone by.

Now, was that an unusual occurrence for you to arrive and find a cargo door open? - No.

What was the practice at that time as far as aircraft which were on a stand before the loading operation is concerned; was it normal for that door to be open or shut? - It depended on the actual flight. If it was a transiting aircraft or aircraft with a short turn-around time, the doors would be left open to, basically, facilitate re-loading rather than if the aircraft was going to stand for any length of time, for security reasons the doors were/
were closed up and the equipment taken off.

What do you mean by "any length of time"?
- Possibly over an hour, longer.

Do you know if there is any company policy in your company about that? - I am not certain of that, sir.

Do you know how long the aircraft which was being loaded by you on this occasion, how long it would have been on the Stand? - I don't know, sir.

Do you know if it had been used on an incoming flight from the United States of America? - I believe that was the case.

Do you know what flight number that was? - I'm not certain about that, no.

If the aircraft had been on the stand for about seven hours between coming in and going out, would it have been normal or abnormal to find the cargo doors open? - Well, I think with reference to the particular flight, this is basically what I said in the previous statement, the fact was the maintenance had to be worked on the aircraft and that's the reason the door was left open -- that's what I was told. I didn't have that as a fact but somebody said that to me.

So/
So can we take it in two stages; first of all, if the aircraft had been on the Stand for about several hours, would you expect the cargo door to be closed unless there was some good reason? - Yes.

For someone to get access via the cargo door? - Yes.

And I think you said an explanation given you was that it had been opened to enable some maintenance operation to be undertaken? - That's what I understood; that's what I was told.

And again can you recall who it was from your team who reported this matter to you? - I believe I am right in saying it was Mr. Wilkins who pointed this factor out.

I think the only other thing that I would ask is: as far as the container which arrived from Frankfurt flight, that's 4041 which went into position 14L, as far as that container is concerned, did you check to see whether it was a full container or a partially full container? - Yes, I did.

What was the position? - It was full.

As a matter of course I have to check to write the weight on the Cool Plan.

Can you help me: we have heard that there were some items of luggage or baggage from the Frankfurt flight which could not go into container 4041 because it was full; can you help me where that baggage would be loaded? - I can only say as normal, it would be loaded in the aft 5 section, the bulk section as we call it.

That would just be loaded individually going up a rocket or something into that aft 5 section? - That's normal procedure, yes.

BY/
BY MS.. LARRACOECHA: Mr. Crabtree, if I understood correct when you towed up the container 40/41 to the position you found it closed first? - Sorry, could you repeat that?

When you first got hold of container 40/41 did you find it closed? - You are talking about the curtain of the container?

Yes? - I couldn't remember. It would normally be closed, yes. I would have a look inside to check the weight but I couldn't remember on this occasion, no.

Do you remember if you had raised the container to verify if it was full as you have just said? - No, I would not have raised it. I would just look in, peep in the inside but I couldn't remember on this occasion, but obviously you would peep in the inside to see if it was full.

As verification of the fact it was full you just looked at the bags inside; you didn't open it up again? - I cannot remember in detail. As I said, 700 is the estimated weight for most full containers. I would just verify the weight by quickly looking to see that it was full and then I would tick the load, 700.

But/
But it doesn't necessarily mean you opened it? - I don't have to open it. You pull the material, the curtain to one side and see the container is full.

What does it take to open a container?

- To open a container namely a soft-sided container there is a metal catch that has a pin that locates on to it which locks the container curtain which you have to open and then physically lift up and that is the procedure.

When you said a soft container did you mean......? - A soft-sided container. There are other types.

When you are in the cargo area placing this container is it normal or does it happen sometimes that you would have other crews down attending the aircraft, namely, catering, cleaning, people like that during this time? Does that happen? - Could you be more specific?

Have you had any instance in your experience of whether anybody cleaning the aircraft at the passenger level, preparing the aircraft for departure -- and that means cleaning, sweeping removing cups from previous flights, catering -- does it ever happen that some of these people for/
for whatever reason would go down or would have access to the cargo area? - The Commissary catering vehicles have to be driven on to the aeroplane as you appreciate with a ramp level which has an elevated section to be lifted up to passenger level but obviously they have to drive out to the aeroplane and they get out there and they go up to the aircraft concerned to get on board. That is normal procedure with any airline operation.

I understand that but my question is would it be easy for those maintenance teams to go to the cargo area? - I would have to say to that question they would not do that because the crew involved -- there would be no need for them and it is never done. No, that is the best way of answering it; it is never done.

BY MR. ANDERSON: Can I just clear up something in my own mind; container 14L went into the forward hold area? - Yes.

When you approached the aircraft your colleague pointed out to you the rear hold door had been open; is that right? - Yes, that is what I was led to believe, that 3 and 4, they call it.

A/
A door you would normally expect is usually closed? - Due to security reasons the door would be closed if the aircraft was standing for any length of time.

Lest anybody may be misunderstanding this, it is your understanding that the door was open on this occasion for a good reason and that was maintenance work was being done inside the hold? - That is what I was told at the time.

No re-examination.

ALAN EDWARD PASSMORE (30), Sworn:

EXAMINED BY MR. HARDIE: I live at 17 Beards Hill, Hampton, Middlesex.

Are you employed by Pan American Airways at London Heathrow Airport as a loader/driver?
- Yes.

How long have you been working there?

And are your duties that you would be loading and unloading passengers' baggage and handling cargo? - Yes.

Were you working at Heathrow on the 21st/
21st December, 1988? - Yes.

What shift were you on? - I was working late shift.

And what time would that shift normally commence? - I believe at the time it was from two in the afternoon until about 10.30 in the evening.

Did you in fact start work before that time to work some overtime? - Yes, I had an early start.

What time did you start? - I started at 6.30 in the morning.

In the course of that shift you helped load and unload various aircrafts and at some point you were asked or instructed by Mr. Sandhu your supervisor to help with the unloading of a flight from Frankfurt to London PA 103A? - Yes.

Now, was that a flight which arrived at stand K16? - Yes.

What were you instructed to do as far as unloading of that aircraft is concerned? - I was instructed to take away the London bags which were in the holds 3 and 4 and I took the London bags away to the arrivals section and after that/
that I came back and they had not finished unloading the front, bellies 1 and 2 and so I parked the vehicle there and I was standing in the next bay and they were placing the bags down ready for transfer.

Your primary duty was to assist in the unloading and taking away of the luggage which was coming off at London for passengers terminating their journey there? - Yes, that is correct.

But you say you drove away that luggage to the terminal and then you returned to the aircraft? - Yes.

Now, before that can I be clear who was detailed to assist you with the unloading of the luggage destined for London? - I can't recollect if anybody came with me. I know I went round to park in what we referred to as the "animal van", a box transit van, and........

Do you know a Mr. Paul Fenlon? - Yes.

And a Mr. Martin Smith? - Yes.

Do you recall their going into the belly of the aircraft that day? - I think to the best of my recollection they were working the front section of the aircraft where I was at the rear.
rear.

So if we can just go back to the point in time when you went and took the luggage to the terminal and then you have gone back to the aircraft, why did you go back to the aircraft at that point? - Standard procedure if you are finished your job to see if anybody else needs a hand with the flight, helping out.

And when you got back there what was happening? - They had not finished offloading from bellies 1 and 2, the transfer bags.

Were those bags which were being put into containers for transfer to New York? - Yes.

Can you remember who it was, which employees, were involved in that operation of loading of the baggage into the containers for transfer to New York? - Who was actually placing the bags into the containers?

Yes? - I am afraid I cannot.

What assistance if any did you give to those people who were working at that stage?
- I was standing by the side of the conveyor as the bags came out of the belly being laid down and I just stood them up so that the lads could put/
put them into the tin easier.

You stood them up as they came off the conveyor or......? - Yes, before they reached the end of the conveyor.

And apart from the people who were actually taking them off the conveyor and putting them in the container were you the only person at the conveyor apart from those two people who were taking bags off? - Do you mean was anybody else present?

Yes? - I am afraid I cannot recall. I know the lads were stacking them into the tin but I was not looking around the vicinity to see if anybody else was there.

I wonder if you would look at Production 160? Do you recognise that sketch? - Yes sir.
Now, did you have anything to do with the preparation of that? - That is what I made as part of my statements to police.

Can you tell us what it is designed to show? - It shows the rocket leading up to the belly way of the aircraft, belly No. 1, which is the smaller one, and the larger belly, belly No. 2, with lads in either of the bellies passing the bags up to come down in the conveyor to be placed in the tins to be transferred, yes.

That is the luggage that is coming into the tin for transfer to New York, is it? - Yes, sir.

We see that according to your sketch it shows Mr. Fenlon and Mr. Smith in the belly of the aircraft; is that right? - Yes, that is correct.

Was that your recollection of how you prepared the sketch, or did someone else tell you that these were the names to put in? - No, to the best of my recollection that is the position the lads were in on that particular flight.

We see at one side of the conveyor your own name and on the other side the names of Mr. Sandhu and Mr. Gill; is that right? - That is right, sir.

Do/
Do you know a Mr. Sidhu? - Yes, I believe he works down from a separate section from what I do, in the preparation of tins ready to go out to join the flight.

Oh, I think there are two Mr. Sidhus. Do you know an Amarjit Singh Sidhu, who...........?
- I am afraid I don't recognise the name. I would obviously recognise the face again, rather than the name.

Before you came in to give evidence did you see someone you know as Mr. Sidhu in the witness room this morning, as opposed to on Friday?
- Yes, sir.

Did you see that Mr. Sidhu at the rocket that day? - To the best of my recollection -- this being two years ago -- I couldn't say 100 per cent whether he was there or not, sir.

Might you be mistaken when you say it was Mr. Gill and Mr. Sandhu, and it might have been Mr. Sidhu and Mr. Sandhu? - That is a possibility, but as I recall from making my statements to the police these were the positions that I remember the lads working in.

When you arrived back at the aircraft while the operation was not completed can you tell us/
us how far advanced the operation was? - By the
time I had come back there was a tin placed at the
end of the conveyor and was in the process of loading
the bags from the two front bellies. By the time
I had got there there must have been perhaps 20
bags already in the tin: whether they came out
from the build-up already being in the tin or had
already been off-loaded from the aircraft I don't
know.

Can you tell us how full the tin was when
you arrived? - I think just under half full.

Was the level more or less even, or was
it fuller at the back than it was at the front,
or what was the position? - To be honest I can't
recollect exactly.

PAUL DESMOND FENLON (26) Sworn

EXAMINED BY MR. HARDIE: My present address
is 126 Hithermoor Road, Stanwell Moor, Middlesex.

Are you employed as a loader/driver by
Pan American Airways at London Heathrow Airport?
- I am.

For how long have you been working there?
- Just over nine years now.

Were you working there on 21st December,
1988?/
1988? - Yes.

What shift were you on? - I was on late shift.

In the course of your shift were you instructed by Mr. Sandhu to help with the unloading of PA103A arriving at K16 from Frankfurt? - Yes.

What were you told to do in relation to that? - I was told to go out and meet the aircraft, and I got a certain piece of equipment ready for the aircraft when it came in.

What piece of equipment? - It is called a baggage rocket.

Did you take the rocket to the aircraft? - As far as I remember, yes.

Was there any particular part of the aircraft that you were involved in unloading? - Yes, the front of the aircraft.

And is that known as bellies 1 and 2? - Yes, sir.

What was contained in those sections of the aircraft? - Baggage in one of the bellies and cargo in the other, if I remember.

As far as baggage was concerned, was that passengers' baggage? - Yes, it was.

How was it stored in the belly? - It was loose baggage, just stacked on top of each other.
It was not contained within a container, or anything of that sort? - No.

Now, did you go into the hold to deal with the baggage? - Yes, I did.

Did anyone else go with you? - If my memory serves me right, yes, someone did.

Can you recall who it was? - As far as I remember I think it was Martin Smith.

Once you were in the hold did you then start passing bags from the hold down the rocket to someone on the tarmac? - Yes, I did.

Can you recall who that was? - I think it was Sidhu -- I can't remember whether it was A or B Sidhu.

Did you see anyone else on the tarmac at the end of the rocket receiving bags apart from Mr. Sidhu? - No, I did not.

Was there any vehicle or container near Mr. Sidhu? - Yes, there was a container.

Was it attached to a tug or anything of that sort? - Yes, it was; a tug.

Now, where was this baggage destined for, the baggage you were putting down the rocket? - JFK.

Were there other parts of the Frankfurt plane/
plane which contained baggage for other destinations?  
- Yes, there were; certain parts.

Can you tell us where the baggage which  
was destined for London was located? - I believe  
it was in the rear of the aircraft.

Were you involved at all in off-loading  
that? - No, I was not.

Did you see the aircraft arriving from  
Frankfurt? - Yes, I did.

So were you out at the aircraft with the  
rocket before the aircraft stopped? - Yes, I was.

Do you know a Mr. Sandhu? - Yes.

Did you see him that day? - Yes, he  
was in crew two.

Was he associated with the rocket as well?  
- Yes.

Apart from you and Mr. Martin, Smith was there  
anyone else in bellies one and two engaged in off-loading  
luggage? - No, I don't think so.

In particular, was there any stranger  
involved in off-loading luggage, somebody you didn't  
know? - No, there was nobody.

Now, as far as the luggage in the hold  
is concerned, that is the luggage you were off-loading,  
how was it stored? Was it in a net, or anything  
of/
of that sort? - There was a net to secure it, yes.

Was it packed as it would be packed in a container, although it was in a net? - Yes.

Within the net can you indicate roughly how many layers of luggage there were? - There could be seven -- no, I am sorry; four or five.

Four or five. Can you remember if you started with one layer and worked all the way down, and then the next layer? How did you off-load this luggage? - You start from the top and work down.

And then on to the second layer of bags? - Yes.

So if we were looking to find a case which ended up in a certain position in the container on the ground and we assume that the luggage was stored within the container as it came off the conveyor do I take it it would not be possible to say it came off one of the -- I am sorry: the first cases or first few cases would not necessarily come off the top of the Frankfurt luggage? - It would be all mixed up: you could never really say.

Now, once the container for PA103 was loaded did you see the container being towed away to the neighbouring Stand? - I can't remember it actually being towed away, but I am sure it was.
In the course of your involvement with the Frankfurt aircraft that day did you see any personnel, Pan American personnel, whom you did not recognise? — No. I recognised everybody.

And did you at any stage go over to the 747 which was on K14? — Yes, I did.

At what point did you go there? — When I had finished unloading the front belly of the inbound.

What was the reason for you going to the 747? — Because I had some baggage that would not fit in the container, loose, New York baggage, so I took that across.

Can you tell us roughly how many items of baggage you were left with that would not fit into the container? — I would say about eight bags, I think, something like that.

And can you tell us what you did with these items of baggage? — I drove them across on a piece of equipment to the rear of the 747 and loaded it into the container.

You loaded it into a container? — Yes.

Now, the container that you loaded it into, was that a different container from the one you had been loading the luggage into at the 727? — Yes, it was. It was an empty container.

An/
An empty container? - Yes.

BY MR. CAMPBELL: Were you the first person to go up into the forward belly of the 727? - As far as I remember, sir, yes, I was.

And were you the person who then took the bags out of the belly and handed them down towards the conveyor? - I handed them to someone else, Martin Smith, who was in the doorway of the aircraft. I was passing bags to him.

So far as the actual removal of the bags is concerned from their position in the hold, were you the man who did that? - Yes.

I wonder if I can just try and get a picture of what the position was in that hold when the door was opened -- it may help us if we look at some photographs and could you have in front of you Production 57. Now, this is a book of several photographs but perhaps if you could look first of all at No. 7; is that a view of the door into the forward hold of a 727? - Yes, it is.

It is similar to the door you went in on the day in question? - Yes.

If you turn to No. 6, the immediately preceding photograph, just tell me if I get things wrong but is that a view looking into the hold area from/
from the doorway? - Yes.

It looks as if it has been taken from somebody standing just a little bit outside the plane on the conveyor? - That's right.

Is that right? - That's right.

And to the right is forward so far as the plane is concerned and to the left is towards the rear of the plane? - That's right.

Is belly No. 1 the hold to the right? - Yes.

And belly No. 2 the hold to the left? - Yes.

And on the day in question was belly No. 1 full of baggage destined for America? - Yes.

What was in belly No. 2? - As far as I remember, cargo.

Cargo? - Yes.

And when you first went in, were you concerned to off-load the baggage destined for America? - Yes.

Now, when you went into the hold area would this area which we can see in the photograph immediately in front of the doorway, would that be empty of baggage? - Yes.

So you could go and stand in that area in/
in preparation for the unloading? - Yes.

Can you give us an indication of the height of the hold; what is the height from the floor to the ceiling? - I think about four feet, three, four feet.

So you would not be able to stand up in the hold? - No, you would not.

Now, we can see to the right of this photograph 2, looks like stainless steel poles with canvas or something like that attached to them; do we see that? - Yes, you do.

Is this similar to the arrangement that pertained in the 727 on the day in question? - Yes.

And would there be some safety netting or rope attached between the two poles? - Yes.

And the purpose of that being what? - Safety net.

Is that to prevent bags coming out? - That's right, yes.

Do I understand that the first thing you would do would be undo that safety net? - It would, yes.

To allow you to get at the bags - Yes.

Now, if we perhaps just look at one or two/
two of the other photographs, if you would look at photograph 1: is that a photograph looking towards the rear of the aircraft from somebody standing up in belly No. 1? - Yes, it is.

So the doors that we have been talking about is on the left-hand side of that photograph?

- Yes.

So far as photograph 2 is concerned, is that a view in the opposite direction towards the front of the aircraft looking from belly 2 up to belly 1? - Yes.

And we have a clear view there of the red door on the right, is that right -- no, I'm sorry, we have a view of the door with something red outside the door; is that right? - Yes.

And do we see in that photograph the two stationary poles which we were talking about a moment or two ago? - yes.

Can you give me an indication, very rough indication, of the distance between these two poles? - I would say roughly three, four........three feet.

About three feet? - Something like that yes.

And if we look at photograph 3, can you tell/
tell us what that is? - That is looking into belly No. 2 from the doorway, I think.

And photograph 4? - That is looking into belly No. 1 from the doorway.

From the doorway? - Yes.

And photograph 5 I take it is just another view looking towards belly No. 1; am I right? - Yes.

Roughly how many bags would belly No. 1 hold? - About 60, 70 bags.

And was it full on the day in question when you came into the cargo hold? - Yes.

The bags covering the whole space of the hold from floor to ceiling and from side to side? - As far as I remember, yes.

And do you have any recollection as to how those bags were stacked; were they stacked in an upright fashion or lying flat or was there a mixture? - A mixture.

Was there any pattern to the loading that you could see so far as the way in which they were stacked? - I don't think so, no.

Now, once you had taken away the safety net that we have discussed, did you start to unload the bags? - Yes.

Perhaps/
Perhaps just to help us, looking at the photograph that you have got on the screen there, can you indicate to us where the first bags were you that you off-loaded? - Where they were?

Yes? - By the ceiling up here.

Could you point again, please? - Oh, sorry, here.

You are indicating the ceiling area between the two poles slightly to the left of the stationary pole which we can see in the middle of the picture; am I right? - Yes.

And so that would be removing bags from the area between the two poles but up in the roof area of the hold? - Yes.

Did you remove those poles at any time?

Sorry, I can't remember.

But so far as the first bags which you unloaded, you have indicated the top layer in that middle section; is that right? - Yes.

So you would take the bags from the top layer between the two poles; am I correct? - That's correct.

Which bags did you take after you had done that; after you had taken the top layer from between the two poles, which bags did you take next?
can you remember? - I'm sorry, I can't remember.

Would you stay in the middle section and remove the next layer down in the middle section, do you think, or what? - Yes.

Would you remove the layer in the middle section down to the floor, if you understand me? - Yes, always, yes.

And roughly how many bags would that exercise which we have been discussing, how many bags would that involve in rough terms? - Oh, roughly 15 to 20.
After that what did you do? Did you just stick with the middle section and work back towards the front face of the aircraft or did you then move to the sides? - I am sorry, but I can't remember.

Have you ever loaded a belly such as this belly No. 1 on a 727? - Yes.

In general terms would I be right in thinking that you would load the cases towards the back of their belly first of all and then move towards the opening we have been describing? - Yes.

Would I be right in assuming the last bags you would load would be in the middle section we have been discussing between the two poles? - Yes.

May I take it from that the bags which you unloaded first at Heathrow on that date were likely to be the bags which were loaded last at Frankfurt? - That is correct.

Did you notice anything in particular about those bags? Was there anything remarkable about them? - No.

Did you look at the baggage tags on those bags? - Yes.

What/
What do you remember about them? -

They were just all destined New York. That is all, really.

Were you checking to see from the baggage tags that these were bags destined for New York?

- Yes.

Do you recall anything else about the baggage tags? - No.

I think we have been told that the bags in a hold such as that might have a Pan Am label on them and then a destination Pan Am 103 New York, or if they were interline bags into Frankfurt then they might have baggage tags of as completely different airline like Lufthansa or something like that but still the destination Pan Am 103? -

That's right, yes.

Do you recall whether those bags, the ones we have just been talking about, the first ones you unloaded, whether they were purely Pan Am bag labels or whether they were interline labels or do you have no recollection? - To my recollection I think they were mixed.

What about the other bags which you removed from that belly? Were they similarly mixed as far as on-line and interline were concerned?

- As far as I remember, yes.
I just wonder how clear your recollection on this might be at this stage, Mr. Fenlon. Do you have a clear recollection of checking those baggage labels as to whether they were on-line or interline? I do not have a clear recollection, no; not at this date.

Do you have any recollection of the type of any of these bags? No, I do not, no.

Do you have any recollection of seeing a Samsonite bag? No.

You have told us there were some bags in belly No. 1 which did not fit into the container. Do you remember that? Yes.

Whereabouts were those bags loaded on belly No. 1? They would be loaded up the far end nearer the back of belly 1, the last ones to come out.

Do you have any recollection of the nature of those bags? No I do not.

To go back to one matter, you told us the first bags that you unloaded you took from the middle section between the two poles taking layers down from the top, down to the floor? Yes.

Which/
Which bags did you take next? —
From the side left and right but I cannot remember which side first.

So, you worked towards the wall of the belly in that way by taking bags in the middle and then going to the side? — Yes.

And moving through the hold in that way? — Yes.

At any time on this day whether on the 727 or on the 747 did you notice anything unusual? — No, I did not.

Did you see anybody acting suspiciously? — No.

So that I am clear about this, Mr. Fenlon, the belly 1 bags, were they all destined for America? — Yes.

And the total number of bags which came from belly No. 1 — — roughly how many? — Around 60-ish.

And was this the only part of the 727 which contained luggage bound for Pan Am 103 to New York? — Yes.

BY MR. GILMAN: When you were in belly 1 unloading the bags from that position did you and the person working with you Mr. Martin (sic) have/
have to look at the tags to assure yourself or yourselves that those bags were destined for New York? — Yes.

And when looking at those tags did you also notice if those tags had come into Frankfurt from another airline? — I cannot remember noticing.

Did you see some of the tags on the bags indicating that they were interline bags into Frankfurt? — What I remember, yes.

What I am really interested to find out if you can remember is did you see on those interline tags on those bags which were interline bags into Frankfurt what was the origin of those bags? Did you notice any origin at all? — No I did not.

MR. HARDIE: I would like to intervene at this stage. I think I would be anxious that this line of examination is not pursued having regard to the criminal inquiry but perhaps over lunch if my friend indicates to me what particular matter he wishes to establish then perhaps I could resolve it that way but I am anxious that there should not be an inquiry into or as to where bags came from.

MR./
MR. GILMAN: I understand that, my lord. Thank you.

THE SHERIFF PRINCIPAL: If you could find out over lunch how far the objection from the Crown goes then you may be able to find out if it is worthwhile pursuing that matter.

MR. GILMAN: I wonder if I could ask just one more point which would not go into that question.

BY MR. GILMAN CONTINUED: Approximately how many bags in your memory -- and it may be difficult to work that out, but if you would for me -- how many of those bags that you removed from belly 1 do you remember were interline bags at Frankfurt with interline tags? -- I could only give an estimate. My memory does not serve me that well on that. I cannot remember.

MR. GILMAN: My lord, may I cross-examine after lunch after discussion with the Crown?

THE SHERIFF PRINCIPAL: Very well.

MR. BAIRD: I do have some questions my lord, but perhaps it would be easier to see what happens as a result of the questions which might be asked by Mr. Gilman which are in roughly the same area.

BY/
BY MS. LARRACOECHEA: Mr. Fenlon, when you were working on belly No. 1 and you unloaded the luggage was there any first-class luggage? - I cannot remember.

Do you recall -- I believe you were asked about Samsonite -- do you recall seeing a hard-shell bronze-coloured suitcase? - No I do not.

In your statement of February the 15th 1990 you said, "All the tags confirmed those bags were to go on Pan Am 103. Most of the bags were either coloured JFK tags.....(reads)......but there were a few bags -- at the most four or five -- which had red and white rush tags on them". Can you explain why that would be. Would that be a rush situation in Frankfurt or.......? - Would that be a what?

A rush in Frankfurt? - It could be Frankfurt or the other destinations in Europe where the bag came from.

So it would not be possible for you offhand like this to know if those bags, the four or five, were placed in a rush at Frankfurt at this stage? - No, I couldn't answer that.

After/
After an adjournment for lunch.

BY THE COURT: You are still on oath; do you understand? - Yes.

THE SHERIFF PRINCIPAL: Mr. Hardie, do you want to say anything at this stage?

MR. HARDIE: My lord, the position of the Crown is as indicated this morning and perhaps, for the sake of the Inquiry I would indicate that there is no objection in principle to counsel or representatives seeking to establish that some of the baggage on the Frankfurt plane was interlined but there would be an objection to any attempt to go beyond that.

THE SHERIFF PRINCIPAL: As to specific questions?

MR. HARDIE: As to specific questions.

BY MR. BAIRD: Mr. Fenlon, with regard to the general questions that you were being asked, you may remember, by the gentleman sitting at the end of the table over there, he was asking you some general questions about how you load and unload a 727 if you were doing that in the ordinary course of your job; remember that? - Yes.

I think you did indicate to us you have loaded a 727? - That's correct.

And/
And in particular you have loaded the No. 1 cargo hold of the belly of a 727? - That's correct, yes.

Now, do you remember also that you were asked if you could remember from the first bags that you off-loaded on that day if there were some interlined bags. I think your answer was you recall there were some mixed bags that came from Frankfurt and some interlined bags? - Yes.

That is your position? - Yes.

Bags were mixed up? - As far as I remember, yes.

What I want to ask you about is this: if you were asked to load a 727 at Heathrow, would I be right in thinking that the chances are that such a flight -- let us say it was a flight to Frankfurt -- might contain baggage of people who just checked in at London? - That's correct.

And it might also contain baggage of people who had flown into London from somewhere else and were flying on to Frankfurt? - Yes.

And the latter set of baggage would be called interline baggage? - Yes.

Is it also right to say as far as Heathrow is concerned, which is where you work, people who have/
have flown in there from another airline would be transferred, that is the passengers transferred on to the outgoing flight and their baggage would go to a place known as the interline shed?  - Yes.

Where it would be separated from a whole lot of other baggage and put to go to the outgoing flight to Frankfurt, to follow my example?  - Yes.

Does that mean, therefore, that if I use the example I have given you, there had been a number of people who were interline passengers in that sense, their luggage would all have arrived at the interline shed and be taken from there to somewhere to be loaded on to the outgoing flight?  - That's right.

Is it likely, therefore, that such interlined baggage would all be together?  - Not always, no. They can arrive at different times.

Have you ever worked on the interline shed?  - I did, years ago, yes.

Just to be clear about that: when you were there were you working in the period immediately prior to December of 1988?  - No, I was not.

Just to follow up what I understand from your answer, does that therefore mean as the luggage came into the interline shed which was maybe destined for the Frankfurt flight, it would not necessarily all be together and taken over, it might trickle through case by case?  - Yes, I would say, yes.

More likely to be sent individually, is that the position, than to be collected together till it was all together and then sent out?  - Yes, that sounds correct.

BY/
BY MR. McEACHRAN: Can you tell us what is the distance between the 727 plane and 747 plane - Do you mean how far apart they were? Yes? - I don't know -- it must have been about 100 yards or something. Wider than this hall? - Yes. No re-examination.

GURPAL SINGH GILL, (36), Sworn,

EXAMINED BY MR. HARDIE: I live at 606 London Road, Colnbrook, Slough, Bucks. Are you related by any chance to the other Mr. Gill who was here last week? - No sir. Are you a loader/driver employed by Pan Am at Heathrow Airport? - Yes. How long have you been working there? - I have been 11 years with Pan Am. On the 21st of December 1988 were you working as a loader/driver? - Yes sir. At Terminal 3? - Yes sir. If we can go to the time about 5 o'clock were you in the rest room at Terminal 3, Pier 7? - Yes. At that point in time did Mr. Sandhu come and ask you to do something? - Yes sir. What/
What was it that he asked you to do?
- He asked me to take the bulk truck to K16.

He said that truck will be used for mail.

Is that a bulk truck?  - Yes, an empty bulk truck.

And what is that used for?  - They use for different stuff. They use for bags, or mail or they use for cargo.

Is this a luggage truck?  - Well, they use for everything. They use for cargo, for bags, and they use for all sorts of things.

And you were to take this bulk truck out to K16?  - Yes.

Was that specifically in connection with the collection of mail?  - He asked me -- he says we will be using for mail.

Did Mr. Sandhu tell you where you were to be working on the 727?  - Yes.

Where was that?  - Her said "You will be working in the No. 3/4 belly in the back of the aircraft.

Did you then obey that instruction and get the empty bulk truck and drive it to stand K16?  - Yes sir.

And did you see the inbound flight EA103 arrive/
arrive at K16? - Yes, it was K16.

Did you actually see the plane arriving?
- No, it was already arriving when I went over there.

Was it stationary or was it coming to a stop?
- It was just coming to a stop.

Now, was Mr. Sandhu on the plane with you when you were there?
- Yes, he was there.

And were there some other people on the plane?
- Yes, all our crew was there.

Were there any strangers, that is, people who were not members of your crew?
- No sir.

Did you see Mr. Sidhu?
- Yes I did see him.

What was he doing?
- He had brought a container with him.

He had brought a container with him?
- Yes.

Was he driving a tug?
- Yes, he was towing a container with the tug.

Did you go into the aft belly No. 3 and 4 on the 727?
- Yes.

Did someone else go with you?
- Yes, Dave Cowan.

What/
What was contained within the bellies 3 and 4? - It was the London bags, the London bags in the back.

And did you offload those London bags on to the rocket? - Yes.

Apart from London bags was there some cargo? - I'm not sure, sir.

Was there mail? - I do not know. I'm not remember.

Were you aware other members of your crew were working in the front bellies? - Yes.

Do you know who they were? - Yes, I know two of them -- Paul Fenlon and Martin Smith was working in bellies 1 and 2. Yes, they were in front.

Now, after you had finished unloading the aft holds did you and Mr. Cowan get off the plane? - Yes.

And what did you do once you got off the plane? - Well, at that time when we offloaded bags the front was almost finished the front. They had all the bags offloaded from the front and then we start offloading the mail from the front.

Could/
2461 G.S. Gill

Could you speak just a little more slowly, Mr. Gill? - Sorry.
Tell me again? - We offloaded the back from the 3 and 4 bellies and we came out and the flight was almost done in the front as well. The front was almost finished offloading as well? - Yes.
Where did you go at that point? - After that we came back to the rest room.
Were you involved at all in offloading baggage from the front bellies 1 and 2? - No sir.
Did you have anything to do with the loading of flight EA 103? - No sir.
You have told me you did not see any strangers when you arrived at the stand K16? - Yes.
When you were in the holds bellies 3 and 4 apart from you and Mr. Cowan was there anybody else in those holds? - I cannot remember, sir.
Did you see any newcomers or strangers at all? - No sir.
To do with this flight? - No sir.
No re-examination.

EDWARD HACKMAN, (29), Sworn,

EXAMINED BY MR. HARDIE: I live at 107 Burns Avenue, Feltham, Middlesex.
Are you employed as a loader/driver by Pan American Airways at London Heathrow Airport? - Yes.
How long have you been working there? - Round about three years.
Were/
Were you working there on the 21st December, 1988?  - Yes, I was.

Were you in fact working in the middle shift from about quarter past one to quarter to ten in the evening?  - Yes, I was.

Now, do you remember Mr. Sandhu, your supervisor, giving you certain instructions in connection with a flight inbound from Frankfurt?  - No, I don't have much recollection of that evening's work at all.

I see. That day did you go to stand KL6 with other loaders?  - Yes, I did.

And can you remember what you were asked to do?  - No, I am afraid I can't.

Can you confirm that you had nothing whatsoever to do with passengers' baggage that day?  - No, I can't. I can't recall whether I was handling baggage or not on that day.

On the 28th December, 1988 did you give a statement to Detective Constable Robson at London?  - Yes, I believe I did.

Was that an accurate statement of what you had been doing the week before?  - Yes.

So if you told him that you were detailed to work in belly 3 and 4 and that you had nothing whatsoever/
whatsoever to do with passengers' baggage, would that be correct? - Yes.

Can you recall if you saw anything unusual or untoward that day in connection with the plane? - No, nothing whatsoever.

EARL EUSTACE HERBERT (49), Sworn:

EXAMINED BY MR. HARDIE: I reside at 135 The Frithe, Wexham Court, Slough.

Are you employed by Pan American as an loader/driver at Heathrow? - Yes.

How long have you worked in that capacity? - From 1977.

On the 21st December of 1988 were you employed on the late shift at Heathrow? - Yes, sir.

Now, can you recall if you had anything to do with the off-loading of Flight PA 124? - I think so, yes, sir.

Can you help us: first of all, where does PA 124 come from? - Los Angeles.

And is that the aeroplane which goes out again as PA 103? - Not at all times, sir.

Well, on that day was it the same plane? - Yes, sir.

Can/
Can you help us as to the period of time that elapsed between the plane coming into Heathrow and its departure? - No, I can't tell you that, sir.

Well, at any rate, were you involved with the aircraft when becoming flight PA 103, that is the outboard flight? - Yes.

What was your first involvement with the aircraft at that time? - My first involvement was to assist Mr. Ron Ives with the loading of the aircraft.

Was there any particular station or part of the aircraft that you and Mr. Ives were allocated? - Yes, we were allocated at the forward of the aircraft.

Is that the forward compartments 1 and 2? - That's correct, sir.

Now, although they are described as compartments 1 and 2, are they in fact separate compartments? - No, sir.

Can you remember what time it was that you went to the aircraft to assist with the loading of it? - I can't remember the exactly time, sir.

Approximately? - Approximately 5 o'clock, sir.
I would say, sir.

When you arrived at the aircraft what was the state of the cargo doors? - The front..... the forward cargo door was locked. I do not know anything about the rear.

Well, the forward cargo doors would be the ones that concerned you because you were going to be working from there; is that right? - That's right.

What was the status of the door? - It was shut.

Did you open it? - I can't rightly remember, sir.

Can you remember who was actually working in the forward cargo compartments that day? - Ron Ives and myself.

Anyone else? - Not to my knowledge, sir.

Now, I think we have heard that the aircraft would be loaded in accordance with a plan which has been called the cool plan; is that right? - That's correct, sir.

Now, did you get a copy of that plan to enable you to load the compartments 1 and 2? - No, I didn't get a copy of the plan, sir.

Who/
Who would have that? - Ron Ives had a copy, sir.

Now, what was your job inside the forward cargo area that day? - I was assisting Ron Ives with the loading of the aircraft.

Can you just tell us what happens when a container comes from the ground up to the cargo door; what is your involvement? - Well, I would be only involved when it gets at the top. The container is pushed on to the bed of the FMC as we call them, a piece of equipment, it is then brought up to the level of the bridge of the FMC, as we call the piece of equipment, and driven towards the hold of the aircraft.

And once it comes to the hold, that is when you become involved with it? - That's correct.

What is your function in the hold? - That function that day, because sometimes the mechanical assistance that we have don't always take the weight of the container, we have to assist by putting the container in, sir.

But that day? - That day is what happened.

You had to push it? - That's correct, sir.

And/
And do you then secure it into position or is that done automatically? - They are not individually secured -- only when we finished loading the aircraft all the containers are secured by lateral guides and threshold stops at the front of the door.

And that is done automatically? -

We do that automatically.

Can you remember who was working at ground level assisting you with the loading of the cargo? - There was one person I can remember and that was Terry Crabtree.

Can you remember if there was anything unusual about the cargo or about the operation that day? - No sir.

When you had loaded the compartments 1 and 2 what did you then do? - After it was finished loading I got off the FMC on to the ground and we drove the FMC from the aircraft.

And did you keep the aircraft in view until it taxied out? - Yes sir.

At any time when you were on the aircraft or after you had finished your loading operation and the aircraft was in view -- at any time did you see anything suspicious? - No sir.

At/
At any time did you see anyone suspicious?

- No sir.

Or acting suspiciously, rather?

- No sir.

Did you see anyone there whom you did not recognise as an authorised person?

- No.

Before you started your loading operations in compartment 1 and 2 did you check to make sure that the compartments were empty?

- When I went up to assist Mr. Ives there was already one double, as we call it, cargo on to the aircraft and I went up when he was trying to put the second one on and from that time I was with Ron Ives.

Do I understand you to say there was one double up. Was that something that you had seen coming up and Mr. Ives was attending to it?

- That is correct.

Apart from that double did the compartment appear to be empty?

- Yes sir.

As far as the baggage from interconnecting flights is concerned does that usually end up near the door?

- That is normal procedure, sir.

Is there any particular reason for that?

- Well, because 103 from Frankfurt comes in and 103 outbound is usually loaded or partly loaded finished/
finished loading by the time 103 comes in, the bags are containerised and they are brought over to 103 outbound and we normally leave 13 right to put that container in that space.

But we know that on this occasion it was located in 14 left; is that right? - I learned that afterwards.

Was there anything unusual about locating it in 14 left as opposed to 13 right? - Nothing unusual.

Can you remember loading that container from the Frankfurt flight? - No sir.

Were you responsible for closing the forward hold door? - No sir.

Did you see the door being closed? - I cannot remember, sir.

Once the forward door hold is closed could people gain access to that hold from the ground? - Not as far as I know, sir.

BY MR. CAMPBELL: Mr. Herbert, have you heard of a procedure involving something called a red checked bag? - Yes sir.

Am I right in saying that is a new procedure which has come in since the disaster? - I think so, sir.

And/
And is that a procedure whereby a bag is tagged as a suspect bag? – Yes sir.

And is the procedure that that bag is not loaded until it has been searched in the presence of the owner of the bag? – That is correct, sir.

BY MR. BAIRD: For some reason when you were asked questions by my learned friend it was something which was perhaps left a little and I would like to ask you about it. You told us that when you assisted Mr. Ives in loading the holds he had already loaded a double, as you call it? – Yes.

Is that a double container? – It is not a double. It is like a pallet, it is a flat pallet.

From then is it correct to say that it occupies two positions in the hold? – That is correct.

A single container which contains suitcases was in one position and the double occupies double? – It stretches itself to both sides of the aircraft, left to right.

Across the way? – Yes.

To be clear about where the double was/
was that had already been located by the time you got into the plane is it correct to say that it would be right as you go through the doors towards your left as far as you can go? — That is correct.

If you would look at 118 which I understand to be a cool plan for this particular flight and look at the top part of it? — Yes; you would like me to point out where the double was?

If you could? — Or the double was?

If the operator could show us the left-hand side at the top, you are already pointing to where the double was? — Yes.

24 left and 24 right? — Yes.

The reason I ask you that is you were asked if you had walked down the hold before you started loading it I think you said you uldn't see all of it because there was a double loaded? — Yes.

And is that where the double was loaded on the far left-hand side? — Yes.

Position 24 left and right? — Yes.

There is one other matter. As I understand it -- correct me if I am wrong -- you usually leave 13 right until the last moment because that is the position at the door; is that right? — Yes, that is correct sir.

And/
And it may be that that is kept for the luggage from the incoming flight on occasions; is that right? - Yes, sir.

But there may also be many other good reasons why that space might be getting kept for something else that was expected late? - That's correct, sir.

BY MS. LARRACOECHA: Mr. Herbert, you said, if I understood correctly, that you arrived about 5 o'clock in the evening? - Yes.

To the 747, that would be the Pan Am 103; could you please describe what was the environment in the aircraft; what kind of attendants and crew teams were around at the time? - When we are assigned a particular job, the No. 1 tells us what we have to take out and what we have to do so we normally leave the rest area at the same time and go to the aircraft. Some are going on vehicles with loads to be loaded on to the aircraft and some just walk across because the rest room is quite near to the Stand the aircraft is at.

You are speaking of Pan Am loaders at this point? - That's correct.

How many would you have been overall?
- I can't remember how many was on that flight offhand.
offhand.

But would there be at the same time mechanics, people attending to the aircraft and the mechanics of the aircraft, forgetting loading and unloading or taking care of the luggage, would there be teams of mechanics refuelling the aircraft or fuelling the aircraft? - That's right on most occasions.

So there was not only your team, there were a number of different people taking care of that aircraft that was ready to take off after 6 o'clock; correct? - That's correct.

Can you give me an approximate figure of how many people you think there were around other than loaders and luggage handlers? - That I can't do.

Do you have an approximate idea of how many mechanics would there be around attending to the aircraft? - No, I can't.

And as far as cleaning people or catering? - That, again, I cannot answer that at all.

Would you say that perhaps about 20 people overall would be approximately? - I would not like to hazard a guess on that one.

BY MR. ANDERSON: Mr. Herbert, do you regularly work on loading of 747's? - Yes, sir.

If/
If I take you back to the time before December of 1988, were you regularly working on loading of 747's at that time? - Yes, sir.

When you go out to a 747 and enter a cargo area as a general practice, what would you do? - Well, sometimes if the doors are shut I probably go up and make sure the door is open or the doors are open and proceed with the loading of the aircraft.

As a matter of general practice do you walk the length of the cargo hold to see if there is anything in there? - If I am operating the lift or the FMC as we call them, I normally do that, sir.

Now, if we go to the 21st of December in particular, as I understand it by the time you entered the hold, the double pallet that you have described to us was already in its location? - That's correct, sir.

Is that correct? - That's correct.

Did you walk the length of the hold down as far as that pallet? - Yes, I did.

And in the course of walking down did you just go down the middle or one side or what? - I go down both sides, walk down one and walk the other one.

What/
What is your purpose in doing that? - Just to make sure there is nothing unusual in the aircraft.

Were you satisfied that there was nothing?
- I was satisfied, sir.

RE-EXAMINED BY MR. HARDIE: One point: Could anyone get into the hold from the aircraft, for instance, you were asked questions by Ms. Larracoechea about the mechanics and people working in the aircraft but could they gain access to the hold? - (No answer).

If you don't know.........? - I don't know, sir.

The way that you gain access to the hold is by means of a hydraulic lift which goes into the hold; is that correct? - That's right, the cargo door.

The FMC goes up to the cargo door that you walk in? - Yes.

Off the FMC and into the cargo door? - That's correct, sir.

RONALD VICTOR IVES (43) Sworn

EXAMINED BY MR. HARDIE: I reside at 185 Harefield Road, Uxbridge.
Are you employed by Pan American Airways, London Heathrow as a loader/driver? - Yes, sir.

How long have you been working there?
- Five and a half years now.

And did you work there on the 21st of December of 1988 initially from quarter to five in the morning until quarter past one in the afternoon?
- Yes.

That was your allocated shift? - That was the shift.

But did you stay on to work overtime after that? - Yes, I did.

And some time at about 1500 hours did you take or drive a lorry to the Pan Am cargo area?
- Yes, I did.

And did you start to load the lorry for the evening flight? - Yes. I was picking up loads, yes.

Now, later on, about 4.50 or thereabouts, were you asked by Mr. Crabtree to load PA103 which was standing at K14? - Yes.

And what was your duty which was allocated to you? - I was the FMC driver.

Is that a special machine? - Yes.

Which enables cargo or items to be raised from/
from the ground up to the level of the cargo doors?  
- Yes, the level of the plane.

What was your position in relation to the FMC; where were you?  
- I was in control of the FMC and in control of the aeroplane, I was outside the aircraft.

You were outside the aircraft?  
- Yes.

Was that on a moving platform?  
- On the top bed, yes.  On the top platform, yes.

And who was assisting you with this operation?  
- Earl was assisting me.

Is that the previous witness?  
- The chap who just came in, yes.

Now, were you given a Cool Plan to enable you to load the aircraft?  
- I had a Cool Plan, yes, but I load the aircraft according to what the No. 1 says.  I know the cargo that's going on and when he has got the bags he puts them on the way he says they are going to go.

Who was No. 1 on this occasion?  
- It was Terry Crabtree.

So was the first piece of cargo you loaded two doubles PLP0277 and PLP0348?  
- It was the two doubles, I can't remember the numbers now.

If you look at the Cool Plan, Production No. 118, do you see positions 24R and 24L there seems to be an item PLP0277 is that correct?  
- That's correct.
In positions 23L and 23R there is an item PLP0348?  - Yes.

And do we see that there lies within what was 3180 and 3190?  - Yes.

Before you started loading cargo into this part of the aircraft did you check the cargo hold?  - Yes, you have got to really check it because I put all the centre guides down to get these two doubles on. So, I have to walk the whole length of the plane anyway to put all the centre guides down anyway and I have actually checked the hull as well. I would see anything that was in there.

You put the centre guides down. Do they run the whole length of the hold?  - I put the centre guides down from 14 to 24, not from 11 to 13.

So you would go in the door that we see in the cool plan and you would check really from 13 the area back to 24R?  - Yes, well, you have to look at all the aircraft really. You have to see that these guides from 11 to 13 are up anyway or 11 to 12 are up anyway. If they were down your tins would move about once you got them in the containers.

Did/
Did you satisfy yourself there was nothing unusual about the hold before you started loading?  
- Oh, yes; everything was okay.

And apart from you and Mr. Herbert was there anybody else in this section of the aircraft once you started loading? - No, I don't think so.

I think we can see from the plan that this area was completely full ultimately?  
- Oh yes; it was full load.

Now, one of the containers which has been positioned on 14L was container 4041 and we have heard that that contained baggage which included baggage from the Frankfurt flight? - That's right.

Do you remember that being loaded?  
- Yes, I remember that one actually.

Was there anything unusual about it?  
- No.

Was there anything unusual about any of the cargo that you loaded that day? - Not really, no.

Apart from confirming there was nobody in the hold, apart from yourself and Mr. Herbert during/
during this operation did you see anybody you did not recognise in the vicinity of the aircraft while you were carrying out your duties? - No I did not.

Once that hold had been loaded can you remember what happened as far as the door is concerned? - Yes, I would have pulled the FMC off which I did do and Herby got some stairs and shut the door himself. I actually saw him do that.

Do you remember seeing him shut the door? - Yes, I got the FMC in a safe place away from the aircraft and I was walking back because they were still loading it into No. 5 aft 5 and I then looked to the door and Herby was shutting it.

This is the stairs he has to get from ...........? - Yes, they are maintenance stairs. They are always on hand.

Once the cargo door or cargo hold door is shut is there any way that people can get access to that hold from the ground? - No, but later on if there was something wrong upstairs like the mechanics, they can get on to the wheel and he has got in there. I wouldn't know how they do it/
it but they can get up to the door. There is electrical works up there and so if there is something wrong they can get up there.

Up through the wheel? — Up through the nose wheel and there is a space up there.

After the hold door was closed was the aircraft left unattended at all? — No.

Did you see the aircraft moving off? — Yes, I was going to the rest room and it was 6 o'clock and it was flashing which means that it is pulling back.

At any time did you see anyone whom you did not know to be a Pan Am employee or an authorised person in the vicinity of the aircraft? — No there was no anybody who should not have been there. I would have challenged him anyway.

You would have challenged him? — Of course I would have.

BY MS. LARRACOECHA: Mr. Ives, while you were loading 4041 did you by any chance look inside or did you just place it in the space that it was supposed to be placed in? — Would you repeat that?

Did you by any chance look inside container 4041 or did you just put it in the place? — No,
- No, I would not be looking in the containers. They had already been shut up with the curtain and somebody had already stacked the container for packing. There would be no reason for me to open it and look inside to see if it was bags, cargo or whatever. I would not do anything like that.

Can you explain in a little more detail and how a technician can get in through a wheel into that area? Can you explain on that? -

I would not really know, but I do know that sometimes you get planes coming in and the door is frozen, it won't open because it is so cold and so you can't open it from the outside controls and so I tell the maintenance fellow and he goes up through the nose and it is something up there to take the controls from the inside.

You are speaking about the cargo door?
- Yes, just located there about 13 right.

Would it be fair for me to say apart from December 1988 your concerns about security after December 1988 have been heightened, but before December 1988 would it be a fair statement to say that concerns for security had been very relaxed?
- I would not say so myself. No, I wouldn't say/
say that. The Alert was there anyway. I think that they X-rayed the bags and was down there too.

I don't know really what they did, but the 103 inbound bags, they took those bags and X-rayed them.

I am not implying that you should know. I am just asking you in general people working at airports prior to this disaster were not very concerned about security of any kind. Is that as fair statement? - We had the Alert chap on the stand that night. So, I don't think it is a fair statement.

What does that mean having an Alert person........

THE SHERIFF PRINCIPAL: We now know that Mr. Ives does not accept that it is a fair comment, Ms. Larracoechea. I don't know whether you want to try and get him to change that, but that is what his last answer was, that he did not accept that it was a fair statement. The Alert chap was there to see same as me. I am there to do my job just like somebody else and if there is somebody else is lurking about an aircraft, even Customs men I have gone up to them before now and said "What are you doing?" and they have showed/
A
showed me their Id and then that is okay, and this man has to do the same thing. I challenge anybody who is around aircraft. So, I don't really think it is a fair comment.
No further questions.
No re-examination.

B
DAVID JOHN BARROW, (45), Sworn,
EXAMINED BY MR. HARDIE: I live at 42 Ladymeade, Ilminster, Summerset and I am a loade driver employed by Pan American Airways at Heathrow
How long have you worked for them?
- 16 1/2 years.
On the 21st of December 1988 were you working at Heathrow on the late shift? - Yes.
And I think the other people on your crew were a Mr. Herbert, Mr. Wilkins and Mr. Fisher?
- Yes.
And was the No. 1 crew loader Terry Crabtree?
- Yes.
Was one of your tasks that day to load Flight PA 103 to New York? - Yes.
And what did you do in that connection?
- I unloaded the rear end of the aircraft.
Were you allocated holds 3 and 4 by Mr. Crabtree? - That's correct.
If you look at Production 118 that is the cool plan, can you indicate where it is in that document where holds 3 and 4 are? - They are here (indicates).
You are indicating the middle series of boxes on the diagram? - Yes, it covers section 3.
That is section 31 to 44; is that right
- Yes.

Now,
Now, as far as that operation is concerned, who else was working in holds 3 and 4? - I don't recall.

Now, were you also allocated duties in respect of hold No. 5? - Not allocated but took on the job.

You took on the job? - Yes.

Now, as far as loading hold No. 4 is concerned that involved the use of an FMC? - Yes.

And were the containers loaded in the normal fashion by use of the FMC and then pushed into position? - Yes.

Was there anything unusual about the operation that day? - Not that I recall.

And did you see anyone acting suspiciously in the vicinity of the aircraft that day? - No.

If you had done what would you have done? - I would have reported it.

Now, I think you said to me a few moments ago that you were not allocated any duties in respect of hold aft 5 but once holds 3 and 4 had been loaded did you go and assist with loading of hold aft 5? - Yes.

What/
What was being put into that hold or aft 5 hold? - As far as I can remember it was courier material.

Was that loaded by means of a rocket? - Yes.

Can you recall apart from the courier material, can you recall if there were any individual items of baggage which were sent up? - I believe they were but I'm not absolutely sure.

In connection with the exercise, that is aft 5 loading, did you remain on the ground or did you go into hold No. 5? - I went in. I was in hold 5 on the actual level.

Now, can you get from holds 3 and 4 into 5? - Only by way of removing a net.

As far as the layout of the aircraft is concerned, is it possible to get from holds 3 and 4 into 1 and 2? - No.

So that if you had access to the aft holds you could not, by any means, get from aft hold into the forward holds? - No.

Now, once the aft hold No. 5 was loaded what happened then? - I recall going to the forward end of the aircraft to see if I could be of any assistance there and there was nothing to/
to be done.

Now, to get to the forward end of the aircraft do I take it from your previous answers you would require to go out of the aircraft; is that right? - Yes.

And then when you say you went to the forward end, did you go on the tarmac or.....?
- On the tarmac.

And by that time you say there was nothing to be done at the forward part? - That's correct.

Now, did you see the hold door being closed? - Yes.

And after that did you wait until the aircraft commenced its taxying? - I don't recall.

JAMES ARNOLD GASKELL (45), Sworn:

EXAMINED BY MR. HARDIE: I reside at 66 Moor View, Watford, Herts.

Are you a loader No. 3 employed by Pan American Airways at London Heathrow? - That's correct.

How long have you been employed as a loader? - 2 ½ years approximately.

On the 21st December of 1988 were you working/
working at Heathrow Airport initially on an early
shift but, by virtue of doing overtime, also in
the afternoon?  - That's correct, yes.

And at about 5 o'clock did Loader No. 1
Crabtree ask you and other loaders to load PA 103
which was stationed at K14?  - Yes, he did,
yes.

Now, what were your duties in connection
with the aircraft?  - My functions were to reverse
the vehicles with the cargo on to the lifters
which were then loaded on to the aircraft. I
also helped to load some bulk items into the aft
of the aircraft.

So that you reversed lorries to enable
the cargo to be transferred from the lorries to
the FMC; is that right?  - That's correct.

Did I understand you to say that you
also helped to manoeuvre pallets or what have
you within the hold?  - No, no, I didn't manoeuvre
any pallets.

What did you do?  - I just reversed
the lorries on to the FMC.

Now, after you had done that were you
asked to give a hand to load the DHL courier material?
- Yes, I was.

Where/
Where was that going? - Into R5, into the rear of the aircraft.

How was that being loaded? - It was off-loaded from a container on to the conveyor belt and then all by hand.

The conveyor belt is what other people have been calling the "rocket"? - That's correct.

Did you remain on the tarmac during this time assisting the loading of the DHL material? - No, I did both. I did some on the rocket then I was asked to stack it in the hold as well.

Now, when you went into the hold was there someone else there? - There was, yes. I'm not sure who it was, though.

You can't remember who it was? - No, I didn't notice.

Was it someone you knew as part of the team? - It would have been, yes.

Apart from the courier bags do you remember any other type of baggage going into hold 5? - Not that I can recall. None at all.

Is it possible that passengers' bags could have been loaded into hold No. 5 without you knowing? - Yes, it is quite possible because there was a fair amount being loaded already when I/
I went up there. All I saw was the actual VHL bag.

No cross-examination.

DOUGLAS PETER FISHER, (45), Sworn:

EXAMINED BY MR. HARDIE: I reside at
4 Jellicoe Close, Windsor Meadows, Slough.

I think you are employed as a loader/driver with Pan American Airways at Heathrow Airport?
- That is correct.

How long have you been working for them?
- Three years and two months.

On the 21st December of 1988 were you on a late shift starting at 1430 hours and finishing about 2300 hours? - That's correct.

At about 5 o'clock in the afternoon were you allocated the duty of working on Flight PA 103 which was parked at K14? - That's correct.

What duty, particular duty, in connection with that aircraft were you allocated? - My main duty was to help with the loading of rear cargo holds 3 and 4.

And were you working with any fellow employee in particular on that day? - Yes, with David Barrow.

And/
And how did you distribute the respective responsibilities between you? - David Barrow was operating the FMC loader and I was assisting him by working the drive system in the aircraft and putting the restraining locks up for the pallets and containers.

So then that meant that you were actually inside the cargo hold area? - That's correct.

And which holds, to be quite clear, would that be that you were in? - In 3 and 4.

Now, before you started loading the cargo did you check the cargo area? - Yes. I normally when I am loading the cargo hold I walk through the cargo hold and mainly to look at the position of the locks and all the restraining side guides to make sure they are all in the right positions for holding the cargo load.

Now, did anything appear to be unusual when you checked the cargo area? - No, everything seemed in order.

I think you then proceeded to load this part of the aircraft in accordance with the cool plan, or a copy of the cool plan which you had been given; is that correct? - That's correct.

Now,
Now, after the hold had been loaded in accordance with the plan, did you then leave the holds? - Yes.

And on leaving the holds did you secure them? - I can't remember whether I secured......by "securing" you mean the doors or the final locks?

The door? - I can't remember whether I closed the door or not.

Did you have anything to do with the final locks given that you asked that question? - Yes, I think I helped to put up the final locks that go across the doorway.

Now, after you had performed your duties in respect of these holds did you take any other part in the loading of this aircraft? - Yes. I assisted in the loading of aft 5 bulk hold.

And what aspect of that operation did you undertake? - As far as I can remember I assisted in the hold taking the load that was coming up and stacking it in the hold.

This was material coming up on a rocket from the ground to the hold; is that right? - That's correct.

And you were taking it off the rocket and stacking it in the hold? - That's correct.

Can/
Can you recall what type of material it was that was coming off the rocket? - The main material was courier bags.

You say "the main material" does that mean there were other types of material? - As far as I remember there was a few passengers bags that came on after the courier bags but I can't be absolutely certain about that.

Once that part of the operation was completed in that the hold was loaded with all the material that was to go in it what did you do? - I go down -- I climbed down the conveyor to the ground and I cannot remember after that what I did.

Did you see anything unusual or suspicious that day as far as the aircraft was concerned? - No, everything was perfectly normal.

Did you see anyone in the vicinity of the aircraft who aroused your suspicions? - I did not see anybody that I should not be there.

No cross-examination.

EVIDENCE FOR THE CROWN ADJOURNED.

Adjourned until tomorrow at 10 a.m.

Certified as correct,