

1 first caliber in the first block is 7.62 over 39.

2 Q. What is that known as? Is that the
3 M855?

4 A. No, that's probably -- I'd have to
5 look on the data sheet -- but that's probably
6 7.62 over 39 API, I believe, but I'm not sure.

7 Q. So in that first one right there
8 where it says back AF-02, and you just described
9 7.62 by 39, did it pass the SAPI standard for an
10 API?

11 A. Yes.

12 Q. Okay. The next one down, what kind
13 of round is that?

14 A. That's a 7.62 by 54. Well, I'd have
15 to look at the data sheet, but it's probably an
16 LPS round. The velocity needed to be 2300 plus
17 50.

18 Q. Did it pass the SAPI standard on
19 that?

20 A. Yes.

21 Q. Is an LPS the same as a BZ?

1 second heavy black line, is it your statement
2 that that is not proper formatting for an H.P.
3 White document?

4 A. I do not know.

5 Q. If you look at what's been marked as
6 Exhibit H. On the third page in, it says Table
7 II, summary of results of V0 testing?

8 A. Yes.

9 Q. Do you see where it says backing and
10 then in parentheses plies?

11 A. Uh-huh.

12 Q. Underneath that it says NA. What
13 does that mean to you?

14 A. It means there is no ply count,
15 suggesting that there's no backing.

16 Q. No backing on this entire test?

17 A. Yes.

✓ 18 Q. And for purposes of a SAPI test,
19 knowing that Dragon Skin is an in-conjunction
20 body armor with backing, would this qualify as a
21 fair test if there were penetrations without the

1 backing?

2 A. No.

3 Q. I'm sorry?

4 A. No, it would not.

5 Q. Okay. And the same question under

6 the NIJ standard, would this qualify as a fair

7 test without the backing?

8 A. No.

9 Q. There are two Contrerases here. You
10 have Juan Contreras and there's another
11 Contreras.

12 A. Miguel.

13 Q. Do you know -- do you train Miguel
14 Contreras also?

15 A. No, I do not.

16 Q. Do you know if today is his standard
17 day off of work?

18 A. Today is not.

19 Q. Is not a standard day off of work?

20 A. Unh-unh.

21 Q. Do you know the reason why he's not

1 training people to be recorders, would you
2 comment on the reliability and the understanding
3 of these footnotes?

4 A. Yes.

5 Q. And would you say that these
6 footnotes do nothing to help anybody assess what
7 was done with this vest?

8 A. Yes.

9 Q. Would you rely on this test, given
10 these vague and confusing statements down at the
11 bottom here?

12 A. No.

13 Q. I'm sorry?

14 A. No.

15 Q. And going back to that one more
16 time. Those footnotes, (a) through (c) there,
17 are those in accordance with any protocol and
18 procedure of H.P. White?

19 A. Not that I'm aware of.

20 Q. And again, the format of this
21 document, not having the heavy black line, the

1 you know, allowable range.

2 Q. Do you see the LPS failure indicated
3 at 2,835 feet per second? That's in the first
4 one you referenced.

5 A. Yes.

6 Q. And if I told you that the SAPI
7 requirement is 2300 or 2350 feet per second,
8 that's approximately 500 feet per second above
9 the SAPI requirement, is that a fair shot? It
10 would be counted?

11 A. No, no, it wouldn't be a fair shot
12 if that's the case.

13 Q. So that failure in 55820L would be
14 excluded from the SAPI requirement then; is that
15 correct?

16 A. I think so. Like I said, unless
17 there's other facts that I'm not aware of.

18 Q. Take a look at the API shot.
19 Describe what an API round is.

20 A. It's an armor piercing round.

21 Q. Is that a level 4 round?

1 Q. But the data you have seen; correct?
2 You're familiar with reading data.

3 A. With the data sheet, yeah.

4 Q. Just not the format in which this is
5 put in.

6 A. Yes, yes, right.

7 Q. Okay. So you described 55815R. And
8 is that one with or without the backing plies?

9 A. That's without the plies.

10 Q. And describe the next penetration
11 you see.

12 A. Well, that's both, the zero degree
13 and the 30 degree on that same plate had
14 penetrations.

15 Q. And that's without the backing ply?

16 A. Right.

17 Q. Do you see any indication of an M855
18 failure?

19 A. No. But like again, I'm not
20 familiar with the velocities at all, so I'm
21 assuming that those velocities are within the,