

Q. Mr. Alo, have you ever seen anyone fishing at NASSCO shipyard?

A. I personally haven't.

Q. Have you ever seen anyone lobstering at the NASSCO shipyard?

A. I personally haven't.

(Deposition of Tom Alo at 92:2 - 7)

Q. Are you aware of any agency inspection reports that indicate someone is fishing at NASSCO?

A. No, I'm not aware of it.

(Deposition of Tom Alo at 93:2 – 93:4)

Q. . . . [W]ouldn't you agree that it's an unrealistic assumption to assume that someone fishes at the shipyard for 30 years and eats only fish caught at the shipyard?

[Objection: vague]

THE WITNESS: I agree.

(Deposition of Tom Alo at 93:12 – 93:18)

Q. So do you agree that mercury in fish captured within the NASSCO leasehold was lower than reference conditions?

[Objection: document speaks for itself.]

THE WITNESS: Yes, according to Table 28-9.

Q. Is there any reason to believe that Table 28-9 is incorrect?

A. No.

(Deposition of Tom Alo at 115:13 -21)

Q. Do you have any site-specific data suggesting that an angler would consume a whole fish or whole lobster at NASSCO?

A. No.

Q. Do you have any site-specific data that they would consume a whole fish and a whole lobster daily for 30 years?

A. No.

(Deposition of Tom Alo at 121:18 -25)

Q. So with this site-specific study on San Diego Bay, is it unrealistic or overly conservative to assume that someone fishes every day at the shipyard for 30 years?

[Objection: incomplete hypothetical.]

A. Yes.

(Deposition of Tom Alo at 144:9-14)