

EXTRACT FROM AFFIDAVIT SWORN ON 28TH DECEMBER, 1931, BY MR. GAETAMO DI GIOIA, MASTER OF THE S.S. "ALABAMA", BEFORE THE NOTARY, DR. A. FASCE.

On the 13th and 23rd July, 1931, as Captain of the S.S. "ALABAMA", and on board, I made the following declaration to the expert, Ing. Goeta, appointed by the Genoa Tribunal.

(a) I went on board on 24th October, 1930, as 1st Deck Officer, assumed command on 9th December, 1930, owing to the illness of the Captain.

(b) As soon as I went on board I examined the decks of the steamer and found no undulations at all, and neither during the first part of the voyage up to 4th March, 1931, did any undulations show in the plating of the decks. I declare that the undulations came during the storm, and I am convinced that they are a consequence of the storm.

I have been able to appreciate the undulations shortly before the arrival at Philadelphia. At Philadelphia I showed them at the moment of arrival to Mr. White, the Surveyor of the Underwriters, and to Mr. Silleman, and to Lloyd's Register Surveyor, Mr. Buchanan, who, after having seen them, did not state to me whether or not, in their judgment, the undulations were there before the storm.

I declare, besides, that the undulations got worse following what happened the 28th to 31st March, 1931, during the voyage from Philadelphia to Manchester.

(c) That the storm was exceptionally bad, and that, following the breaking of the shaft of the rudder ~~brake~~^{steering gear}, it was necessary to work the rudder by hand.

(d) I thought it advisable to move the cargo towards aft to allow better control of the vessel.

(e) I thought it advisable to throw gas-oil from the cargo to get relative calm round the vessel in order to be able to handle the rudder; besides, I placed oil bags, and threw oil from the baths and W.C.'s on the wind side.

(f) That the change of course towards the nearest port was decided unanimously by the Officers and Under-Officers on board, as it was not possible to undertake suitable repairs of the rudder ~~engine~~^{steering}, as the weather remained stormy.

At this point the interrogation was suspended and resumed on the 23rd July, 1931.

(g) I found escapes of gas-oil from the structural parts of the vessel, including the outside plating as well, at sea until the arrival at Philadelphia, and also on the return voyage after the storm which happened after leaving Philadelphia.

(h) I state that, through wireless during the navigation, and afterwards after the arrival at Philadelphia, I learnt that very many steamers suffered serious damage through meeting the cyclone which struck the "ALABAMA", so that some of them had to stand by, which proves the force of the cyclone.

I also declare that, as soon as I arrived at Philadelphia, I drew the attention of the Surveyors, Messrs. Buchanann White, Silleman, to the undulations shown in the deck of the S.S. "ALABAMA", and that I have never declared, nor heard it declared, that such undulations existed prior to what occurred in March, 1931.

I also declare that no mention was made to me later on by the Surveyors at New York regarding the said undulations.

I declare also that, when unloaded, that is, at the arrival at New York, the undulations were not visible.

Signed, G. De Gioia

" , A. Fasce, Notary.

The notary's signature is legalised by the Chief Clerk of the Court, and the signature of the Chief Clerk of the Court is legalised by the British Consulate.



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