

- Q.8 What is the shape of the terrain at this point?  
A.8 The ground slopes sharply.
- Cross-examined by the Defending Officer
- Q.9 Mr. Jones, are you familiar with the operational role of the Irish Regiment of Canada at New Wellington Barracks, Halifax?  
A.9 Yes, I am.
- Q.10 Will you please explain this role?  
A.10 We maintain one A.A. L.M.G. Company for the defence of the site against enemy aircraft. One Carrier company. One Rifle company, and a Head-quarters company for Administration, also Air maintenance and supply.
- Q.11 How long had this A.A. Post been an integral part of the set-up?  
A.11 Approximately eight weeks.
- Q.12 Would that make it from approximately the 1st. of January 1942?  
A.12 No, I would say from December 26th, 1941
- Q.13 Then it was in the light of after-thought placed there for the defence of New Wellington Barracks only?  
A.13 It is true it was prepared sometime after the regiment occupied New Wellington Barracks; however it is a part of the defences.
- Q.14 Nevertheless, it would be effective only in the case of direct enemy aerial attack on the site itself?  
A.14 That is doubtless so.
- Q.15 Do you consider the defence of Halifax Area more important than the defence of Wellington Barracks?  
A.15 I would say so.
- Q.16 Then you do consider it so?  
A.16 Yes, I do.
- Q.17 Were ~~definite~~<sup>g4</sup> definite orders given to the men regarding their duties as guards at the A.A. Posts?  
A.17 Yes, I would say so.
- Q.18 Were these standing orders, or orders read to the men individually?  
A.18 I cannot be sure.
- Q.19 Then you are not certain?  
A.19 No.
- Q.20 You stated that when you glanced out of the window you saw a soldier of the Irish Regiment standing at No. 1 A.A. Post. How did you recognise him as such?  
A.20 He was wearing a green bonnet and I presumed him to be so.
- Q.21 What would be the distance from your window to No. 1 A.A. Post?  
A.21 Approximately fifty yards.
- Q.22 That then would make the distance from from your window to the fence, what?  
A.22 Approximately ninety to a hundred yards to the fence.
- Q.23 What can you see from your window?  
A.23 From the window the ground rises for some distance. At the crest is No. 1 A.A. Post and beyond that the fence or barrier.
- Q.24 You stated that you could also see No. 2 A.A. Post, did you not?  
A.24 Not from the window. I stated that after I ran out of the Officers Quarters I saw the second soldier running back to No. 2 A.A. Post.
- Q.25 You ran quite fast from the Quarters to the Post?  
A.25 Galluped is the word.