

- 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 ~~there~~<sup>any</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.