

# Exhibit C

Robert Wood

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: EAST PALESTINE ) CASE NO.  
TRAIN DERAILMENT ) 4:23-CV-00242-BYP  
 ) JUDGE BENITA Y. PEARSON

MONDAY, DECEMBER 11, 2023

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

- - -

Videotaped deposition of Robert C.  
Wood, held at the offices of Kilpatrick  
Townsend & Stockton LLP, 1100 Peachtree  
Street NE, Suite 2800, Atlanta, Georgia,  
commencing at 9:03 a.m. Eastern, on the above  
date, before Carrie A. Campbell, Registered  
Diplomate Reporter, Certified Realtime  
Reporter, Illinois, California & Texas  
Certified Shorthand Reporter, Missouri,  
Kansas, Louisiana & New Jersey Certified  
Court Reporter.

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15 JOSH COLEMAN,  
Golkow Litigation Services  
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Robert Wood

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1 QUESTIONS BY MR. SWANSON:

2 Q. You have no way to indicate  
3 that polymerization was occurring in the  
4 Trinity car.

5 Right, sir?

6 MS. PETTY: Objection.

7 THE WITNESS: Correct.

8 QUESTIONS BY MR. SWANSON:

9 Q. The pressure and temperature  
10 readings that you received from the TILX 2025  
11 car were in no way indicative of a potential  
12 BLEVE.

13 Were they, sir?

14 MS. PETTY: Objection.

15 THE WITNESS: No.

16 QUESTIONS BY MR. SWANSON:

17 Q. They were not, right?

18 MS. PETTY: Objection.

19 THE WITNESS: That's correct.

20 QUESTIONS BY MR. SWANSON:

21 Q. And you know, based on the  
22 pressure and temperature readings of  
23 Trinity's 2025, that Norfolk Southern and its  
24 contractors believed the car was a candidate  
25 for re-railing.

1 Right?

2 MS. PETTY: Objection.

3 THE WITNESS: That was part of  
4 the decision tree, and, yes,  
5 originally we did believe that.

6 QUESTIONS BY MR. SWANSON:

7 Q. Right.

8 What you wanted to do with the  
9 Trinity car, 2025, was put it back on the  
10 tracks and send it on its way.

11 Right, sir?

12 MS. PETTY: Objection.

13 THE WITNESS: That's correct.

14 QUESTIONS BY MR. SWANSON:

15 Q. And I'm going to give Norfolk  
16 Southern the benefit of the doubt that you  
17 wouldn't have contemplated doing that if you  
18 thought there was any risk of polymerization.

19 Right, sir?

20 MS. PETTY: Objection.

21 THE WITNESS: That's correct.

22 QUESTIONS BY MR. SWANSON:

23 Q. Norfolk Southern wouldn't have  
24 considered re-railing Trinity's 2025 if it  
25 believed there was any concern about a

1 potential BLEVE.

2 Right?

3 A. That's correct.

4 Q. What you know, based on the  
5 pressure and temperature readings of  
6 Trinity's 2025, was that that car was stable.

7 Wasn't it, sir?

8 MS. PETTY: Objection.

9 THE WITNESS: At the time it  
10 was observed, that's correct.

11 QUESTIONS BY MR. SWANSON:

12 Q. That car was stable right up to  
13 the moment that you detonated it in the vent  
14 and burn.

15 Wasn't it, sir?

16 MS. PETTY: Objection.

17 THE WITNESS: That's correct.

18 QUESTIONS BY MR. SWANSON:

19 Q. What you know, based on the  
20 temperature and pressure readings that you  
21 took from Trinity's 2025, was that that car  
22 performed exactly as it was built to perform  
23 in a derailment.

24 Didn't it, sir?

25 MS. PETTY: Objection.

1 MR. FUKUMURA: Objection.

2 THE WITNESS: That's correct.

3 QUESTIONS BY MR. SWANSON:

4 Q. And what you know from those  
5 pressure and temperature readings  
6 specifically is that the pressure release  
7 device on 2025 acted exactly as it should in  
8 a derailment.

9 Correct?

10 MS. PETTY: Objection.

11 MR. FUKUMURA: Objection.

12 THE WITNESS: That's correct.

13 QUESTIONS BY MR. SWANSON:

14 Q. Now, I've seen evidence in the  
15 factual report we've been talking about that  
16 the reason Norfolk Southern didn't re-rail  
17 Trinity's 2025 car was because of a damaged  
18 bolster.

19 Is that your understanding?

20 MS. PETTY: Objection.

21 THE WITNESS: No.

22 QUESTIONS BY MR. SWANSON:

23 Q. Okay. Let's turn, if we could,  
24 to page 85 of 158.

25 A. Yes.

1 the derailment default anything Trinity did  
2 or did not do in assisting with the  
3 derailment response?

4 MS. PETTY: Objection.

5 THE WITNESS: I'm sorry, I  
6 didn't understand.

7 QUESTIONS BY MR. SWANSON:

8 Q. As the person on the ground --  
9 as a person on the ground for Norfolk  
10 Southern who was helping -- I can't read that  
11 now. Let me try it again.

12 All right. As a Norfolk  
13 Southern employee who was on the ground  
14 helping to manage the response to the  
15 derailment, do you fault anything that  
16 Trinity did or didn't do in assisting with  
17 the derailment response?

18 A. No.

19 Q. Was Trinity consulted in any  
20 way before Norfolk Southern made the decision  
21 to vent and burn 2025?

22 MS. PETTY: Objection.

23 THE WITNESS: Not to my  
24 knowledge.

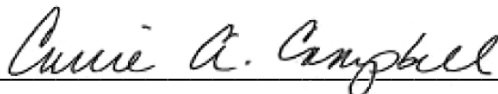
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## 1 CERTIFICATE

2 I, CARRIE A. CAMPBELL, Registered  
3 Diplomat Reporter, Certified Realtime  
4 Reporter and Certified Shorthand Reporter, do  
5 hereby certify that prior to the commencement  
6 of the examination, Robert C. Wood, was duly  
7 sworn by me to testify to the truth, the  
8 whole truth and nothing but the truth.

9 I DO FURTHER CERTIFY that the  
10 foregoing is a verbatim transcript of the  
11 testimony as taken stenographically by and  
12 before me at the time, place and on the date  
13 hereinbefore set forth, to the best of my  
14 ability.

15 I DO FURTHER CERTIFY that I am  
16 neither a relative nor employee nor attorney  
17 nor counsel of any of the parties to this  
18 action, and that I am neither a relative nor  
19 employee of such attorney or counsel, and  
20 that I am not financially interested in the  
21 action.

22 

23 CARRIE A. CAMPBELL,  
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