

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

DONJON-SMIT, LLC

VS.

**ADMIRAL KARL L. SCHULTZ, CAPTAIN
JOHN W. REED, COMMANDER NORM C.
WITT, and COMMANDER MATTHEW J.
BAER, IN THEIR OFFICIAL CAPACITY
AS OFFICERS OF THE UNITED STATES
COAST GUARD**

NO. 2:20-CV-00011 LGW-BWC

**PLAINTIFF DONJON-SMIT, LLC'S
SUPPLEMENTAL RESPONSE TO THE COURT'S INITIAL QUESTIONS**

Pursuant to this Court's February 21, 2020 Order, Plaintiff DONJON-SMIT, LLC ("DONJON-SMIT") files this Supplemental Response to the Court's initial questions only to attach an Exhibit that was inadvertently omitted from the original Response.

Respectfully submitted,

**TAYLOR, ODACHOWSKI, SCHMIDT &
CROSSLAND, LLC**

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CERTIFICATE OF SERVICE

This hereby certifies that on this day, I electronically filed the ***Plaintiff Donjon-Smit, LLC's Supplemental Response to the Court's Initial Questions*** with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

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This 25th day of February, 2020.

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Date	ER skim	MDO PS	MGO PS	MGO SB	MDO SB	HFO#4PS	HFO#4SB	HFO#3PS	HFO#3SB	HFO#2PS	HFO#2SB	HFO#1PS	HFO#1SB	Remarks			
20-Sep	2400 gallons from 8 totes, recovered by vac truck																
21-Sep	57.7																
22-Sep	32.9																
23-Sep	12.9																
24-Sep	13.1																
25-Sep	10.55			127.05			46.63										
26-Sep	continues in a tote		hottap	186.39		hottap	10.76										
27-Sep	continues in a tote		348.39		250			pumped and no oil									
28-Sep	continues in a tote		115	383	110									608			
29-Sep	continues in a tote			98	90									188			
30-Sep	no ops												761				
01-Oct	no ops												732				
02-Oct	continues in a tote											641					
03-Oct	continues in a tote											403					
04-Oct	continues in a tote									5	0		285				
05-Oct	continues in a tote - 5 totes total on shore											113					
06-Oct	no ops due to weather																
07-Oct	no ops due to weather																
08-Oct	continues in a tote											366.64					
09-Oct	continues in a tote											159.44	44.33				
10-Oct	continues in a tote											8.32	11.09				
11-Oct	continues in a tote	17						41.55									
12-Oct	no ops					94								Slops pumped to sloptank(B-33)			
13-Oct	continues in a tote					8.5											
14-Oct	continues in a tote					333											
15-Oct	continues in a tote					262.72											
16-Oct	no ops due to safety stand down																
17-Oct	1501 gallons removed from totes by vac truck	7.3				163.25								Incl approx 70 barrels Oily water of HFO#4P and MDO PS in tanktainer			
18-Oct		223												Quantity from both HFO#4PS and MDO PS			
21-Oct		223															
22-Oct		79.4															
23-Oct		51.7				34.8											
Total in B33														Total excl skimmed oil			
Barrels	127.2	601.4	463.4	794.4	450.0	896.3	57.4	41.6	0.0	5.0	0.0	1691.4	1833.4	6834.26	barrels		
Gallons	5340.3	25258.8	19462.4	33366.5	18900.0	37643.3	2410.4	1745.1	0.0	210.0	0.0	71038.8	77003.6	287038.92	gallons		
M3	20.2	95.6	73.7	126.3	71.5	142.5	9.1	6.6	0.0	0.8	0.0	268.9	291.5	1086.53	m3		
Total (m3)														Total (gallons)			
08-Sep	m3	73.96	75.36	120.56	70.48	134.37	14.47	4.30	7.50	6.50	11.10	279.30	309.00	1106.90	original on board	292411.99	Percentage remaining/un pumpable
00h00	Difference Δ	21.65	-1.69	5.74	1.06	8.12	-5.35	2.31	-7.50	-5.71	-11.10	-10.40	-17.52	-20.37	Difference Δ remaining	-5381.76	-1.84%
		Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Remarks Sanitation: - #1P cleared 930 gallons - #1S Cleared total 4681gallons - # 3P Cleared 500 gallons - # 3S Cleared 535 gallons - # 2P Cleared 85 gallons - # 4P Cleared 360 gallons - # 2S Cleared 794 gallons - # 4S Cleared 1431 gallons - # MDO Storage S 1822 gallons - # MGO Storage S 110 gallons			

Completed pumping and blanked hottap.

total divided over the tanks pumped from

pumped quantity includes a certain amount of water

Estimation as water was pumped besides oil

Date	ER skim	ST skim	HFO#1 Srv P LS (17)	HFO#1 Stl P LS (21)	HFO#2 Srv P HS (19)	HFO#2 Stl P HS (23)	FO OVFLOW ER (31) + FO Drain TK	MDO Serv SB (27)	MGO serv SB (30)	LO ME#1+#2 cyl oil fwd (Cyl tech 100)	LO Gen Settl (TLX Plus 404)	LO Gen Settl Stor (TLX Plus 404)	MLO Settl	MLO Stor	Remarks
21-Oct															
22-Oct										330		110			
23-Oct	Skimming in ER	Skimming in ER								110		110			
24-Oct	Skimming in ER	Skimming in ER													
25-Oct	Skimming in ER	Skimming in ER													
26-Oct				60.35											
27-Oct				unknown											Oil Barge seemed to have leveled 4 m3 between #4P(slop) and #1S(LS HFO)
28-Oct	Skimming in ER			21.4											
29-Oct	Skimming in ER			21											
30-Oct	6.3			21											
31-Oct	5			60											estimate
01-Nov	6		2.1	122											
02-Nov	4		10?												estimate
03-Nov	3.6		13.8												
04-Nov	no skim ops		ongoing												
05-Nov					1100										
06-Nov	4.8				2000										
07-Nov		1100													
08-Nov		no ops													
09-Nov		1500													
10-Nov							1093								
11-Nov		651													
12-Nov		1000													
13-Nov		no ops													
14-Nov															
15-Nov															
16-Nov															
17-Nov															
18-Nov													Checked	Checked	
19-Nov															
20-Nov		skimming													
Total in B33															Total excl skimmed oil
Barrels	29.7	101.2	15.9	305.8	73.8	0.0	26.0	0.0	0.0		0.0				421.48
Gallons	1247.4	4251.0	667.8	12841.5	3100.0	0.0	1093.0	0.0	0.0	440.0	0.0	220.0	0.0	0.0	18362.30
M3	4.7	16.2	2.5	48.6	11.8	0.0	4.2	0.0	0.0	1.7	0.0	0.8	0.0	0.0	69.58

Total (m3)															Total (gallons)		
08-Sep	m3	m3	35.46	23.36	40.30	31.00	0.46	4.43	19.63		Empty				154.64	original on board	40851.56
00h00	Difference Δ	Difference Δ	-32.93	25.25	-28.52	-31.00	3.69	-4.43	-19.63	1.67		0.84	0.00	0.00	-85.06	Difference Δ remaining	-22470.97
			Empty	Empty	Empty	Empty	Empty	Empty	Empty	8 drums via gooseneck PS	Empty	4 drums via gooseneck PS	Empty	Empty	Removed from other tanks: - FO Sludge tank (frame 14-18, deck 3-4) - 2 barrels/84 gallons/0.8 m3 - Pumping Cyltech Act drums into tanktainer (21 drum total) - Me Lub oil sump pumped to slop tank on the oil barge (123,4 barrels/5199.6 gallons/19.7m3) - LO Sludge tank (2 totes - 600 gallons) - MDO and Waste oil tank for the incinerator found empty - EM generator tank - 375 gallons and confirmed empty (15/11) - Emptied drums from Steering gear - 551 gallons (14/11) & 375 gallons (15/11) & 654 gallons (16/11) & 60 gallons (19/11) & 280 gallons(23/11) - LO drain tank empty (18/11) - Cyl Measuring tank ongoing (19/11)- 31 gallons - Sterntube sump tank confirmed empty (22/11) - Scavenging air box drain tank confirmed empty (22/11) - Oily Bilge tank empty after pumping 885 gallons (22/11) - Bilge Holding tank empty (23/11) -		

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