

**Commission of Inquiry into the Diaphragm Wall and Platform Slab Construction
Works at the Hung Hom Station Extension under the Shatin to Central Link Project**

THIRD WITNESS STATEMENT OF KHYLE RODGERS

I, KHYLE RODGERS, of [REDACTED], say as follows:

1. I refer to my first witness statement dated 2 October 2018 (“**First Witness Statement**”) and my second witness statement dated 18 October 2018 (“**Second Witness Statement**”). Unless otherwise stated or the context otherwise requires, any abbreviations shall bear the same meaning as in my First Witness Statement and Second Witness Statement.
2. I make this statement in response to the statements of China Technology’s witnesses. Any allegations or matters raised in those statements (or any other statements) which are inconsistent with my First Witness Statement and Second Witness Statement are denied. If I do not address any allegations or matters raised in other witness statements, it should not be construed as an admission on my part.
3. Unless otherwise stated, the facts stated herein are within my personal knowledge and are true. Where the facts and matters stated herein are not within my own knowledge, they are based on the stated sources and are true to the best of my knowledge.
4. The witnesses from China Technology allege that they witnessed the threaded ends of rebars being cut in specific locations on the site and on specific dates. It is therefore relevant to identify the final dates when reinforcement would have been installed in each area of the EWL Slab and NSL Slab. I was the superintendent of the HUH section of the Project which included the EWL Slab and NSL Slab, and can comment on this matter.
5. I note that the last concrete pours for the following areas of the EWL Slab and NSL Slab were completed on the following dates:

- (a) EWL Slab - Area A - 24 July 2015 (Bay 6)¹;

¹ Pages 49 - 57 of Exhibit “KR-1”.



C25789

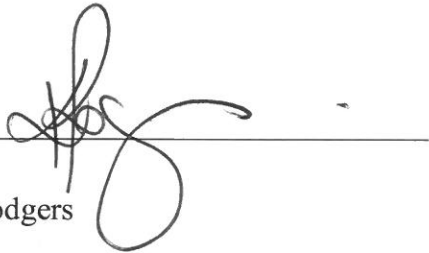
- (b) EWL Slab - Area HKC - 16 August 2016 (Bay 3)²;
- (c) NSL Slab - Area A - 21 May 2016 (Bay A NSL 5)³;
- (d) NSL Slab - Area B - 18 May 2016 (B NSL B2)⁴; and
- (e) NSL Slab - Area C - 26 April 2016 (C1 NSL C1-0)⁵.

6. My knowledge of the dates of all concrete pours for EWL Slab and NSL Slab is taken from the concrete test results for the EWL Slab and NSL Slab.⁶ In particular, the dates noted above for the concrete pours reflects the “sample date” in the test results. These test results were prepared by an independent laboratory. A copy of these concrete pour test results is produced and marked **Exhibit “KR-1”**.

Dated the 23rd day of October 2018.

Signed: _____

Khyle Rodgers



² Pages 96 - 119 of Exhibit “KR-1”.

³ Pages 162 - 175 of Exhibit “KR-1”.

⁴ Pages 209 - 243 of Exhibit “KR-1”.

⁵ Pages 277 - 313 of Exhibit “KR-1”.

⁶ The test result for the EWL Slab Area C, Bay C3-2 and C3-3 includes a typographical error which states that the Bay is “C3-3 and C3&4”. In fact, this test result was for the last concrete pour for Area C of the EWL Slab.