

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
NEW ORLEANS DIVISION**

**IN RE: FEMA TRAILER
FORMALDEHYDE
PRODUCT LIABILITY LITIGATION**

**MDL NO. 1873
SECTION "N-5"**

**JUDGE ENGELHARDT
MAG. JUDGE CHASEZ**

**THIS DOCUMENT IS RELATED TO:
Lyndon Wright v. Forest River, Inc., et al.
Case No. 09-2977 (E.D. La.)**

PLAINTIFF'S WITNESS LIST

NOW INTO COURT, through undersigned counsel, comes Plaintiff, Lyndon Wright, pursuant to this Honorable Court's August 2009 Trial Scheduling Order, who hereby submits the following Witness List in connection with the above-captioned matter, which may be supplemented based upon ongoing discovery as needed:

	Category:	Witness:	Type of Witness:	May / Will Call:
	Plaintiffs:			
1.		Lyndon Wright	Fact	Will Call
	Specific to Wright:			
2.		Bobbi Wright	Fact	May Call
3.		Tyshawn Marsh	Fact	May Call
4.		Dr. Field	Fact	May Call (Deposition)
5.		Any and all other doctors at Uptown Nephrology who have treated and/or have	Fact	

		knowledge of Lyndon Wright		
6.		Gina Manguno-Mire, Ph.D.	Fact	May Call
7.		Albert Jarrell	Fact	May Call
8.		Nicole Dyson	Fact	May Call
9.		Tomika Zachary	Fact	May Call
10.		Any and all witnesses who may be identified or discovered during the ongoing litigation		
	Experts:			
11.		Dr. Lee Branscombe, Ph.D., C.C.M.	Expert	May Call
12.		Dr. Paul Hewett, Ph.D.	Expert	Will Call
13.		Dr. Kenneth Laughery, Ph.D.	Expert	May Call
14.		Alexis Mallet, Jr.	Expert	Will Call
15.		Dr. Lawrence Miller, M.D.,M.P.H.	Expert	Will Call
16.		Charles David Moore, P.E., P.L.S.	Expert	May Call
17.		Ervin Ritter, P.E.	Expert	May Call
18.		William Scott, P.E., C.H.M.M.	Expert	May Call
19.		Dr. Edward Shwery, Ph.D.	Expert	Will Call
20.		Dr. Stephen Smulski, Ph.D.	Expert	Will Call
21.		Dr. Patricia Williams, Ph.D.	Expert	Will Call
22.		Paul LaGrange	Expert	May Call
23.		Dr. Richard A. Spector	Expert	May Call
24.		Custodian of Records for Dr. George A. Farber	Expert	May Call

25.		Any and all witnesses who may be identified or discovered during the ongoing litigation	Fact/Expert	
	U.S.A.			
26.		Robert James, Ph.D.	Expert	May Call
27.		Bruce Kelman, Ph.D.	Expert	May Call
28.		Michael Lindell, Ph.D.	Expert	May Call
29.		Richard Monson, M.D., Sc.D.	Expert	May Call
30.		Mark Polk	Expert	May Call
31.		Coreen Robbins, M.H.S., Ph.D., C.I.H.	Expert	May Call
32.		Dr. Christopher DeRosa Center for Disease Control and Prevention (CDC)	Fact / Expert	May Call (By Deposition) Not Expert
33.		Representative of the Federal Emergency Management Agency (FEMA)	Fact	May Call
34.		Bryan McCreary FEMA Contracting Officer	Fact	May Call
35.		Chief R. David Paulison FEMA Administrator	Fact	May Call
36.		Admiral Harvey Johnson FEMA	Fact	May Call
37.		Chief Bronson Brown FEMA Occupational Health and Safety	Fact	May Call
38.		David Chawaga FEMA Head of Safety in Washington, D.C.; IA at Occupational Safety and Health	Fact	May Call
39.		Eddie Kendrick FEMA Activity Supervisor/Contact for FEMA's Job Hazard Analysis for trailer in-bound inspections	Fact	May Call
40.		Person(s) who performed and supervised the "FEMA Job Hazard Analysis" in July 2006	Fact	May Call

41.		Patrick "Rick" E. Preston FEMA Trial Attorney, Office of General Counsel	Fact	May Call
42.		Mary Ellen Martinet FEMA Attorney	Fact	May Call
43.		Stephen Miller FEMA	Fact	May Call
44.		Kevin Souza FEMA Administrative Program Management Branch Chief	Fact	May Call
45.		Wayne Stoeh FEMA	Fact	May Call
46.		David Garrett FEMA	Fact	May Call
47.		Michael Lapinski FEMA	Fact	May Call
48.		David Porter FEMA	Fact	May Call
49.		Martin McNeese FEMA	Fact	May Call
50.		Carol Wood FEMA	Fact	May Call
51.		Chandra Lewis FEMA	Fact	May Call
52.		Gary Moore FEMA/DHS, Director of Logistics	Fact	May Call
54.		Betsy Hall FEMA, Gulf Coast Recovery	Fact	May Call
55.		Chairman Ross FEMA	Fact	May Call
56.		Jordan Fried FEMA	Fact	May Call
57.		Don Jackson FEMA, Material Coordinator	Fact	May Call
58.		FEMA Inspector for Forest River, Inc. Plant, yet to be designated	Fact	May Call
59.		Joseph Matthews Office of Emergency Preparedness Director	Fact	May Call
60.		Jill Igert Office of General Counsel	Fact	May Call
61.		Guy Bonomo FEMA, Direct Housing Operations Chief	Fact	May Call
62.		Representative of Centers for Disease Control and Prevention (CDC)	Fact	May Call
63.		Joseph Little, CDC; ATSDR	Fact	May Call

64.		Representative of ATSDR	Fact	May Call
65.		Philip M. Allred Agency for Toxic Substances and Disease Registry (ATSDR)	Fact	May Call
66.		Sharon Wilbur, M.A. ATSDR, Division of Toxicology	Fact	May Call
67.		Thomas Sinks ATSDR	Fact	May Call
68.		Howard Frumkin ATSDR	Fact	May Call
69.		Donald Benken ATSDR	Fact	May Call
70.		Scott Wright ATSDR	Fact	May Call
71.		Representative of Environmental Protection Agency (EPA)	Fact	May Call
72.		Sam Coleman EPA	Fact	May Call
73.		Chairman Henry A. Waxman, D-California House Oversight and Government Reform Committee, Ranking Minority Member	Fact	May Call
74.		Representative Gordon Tennessee Chairman of the House Committee on Science and Technology	Fact	May Call
75.		Steven Larsen FEMA	Fact	May Call
76.		Michael Harder FEMA	Fact	May Call
77.		Any and all witnesses who may be identified or discovered on the basis of Defendant's responses to discovery propounded by Plaintiff or depositions taken during discovery in this matter	Fact/Expert	May Call
	Forest River, Inc.			
78.		Elton Kiefer	Fact	May Call
79.		Jeff Burrian	Fact	May Call
80.		Norman Nelson	Expert	May Call
81.		G. Graham Allan	Expert	May Call
82.		Philip Cole, M.D.	Expert	May Call

83.		Nathan T. Dorris	Expert	May Call
84.		William L. Dyson	Expert	May Call
85.		Thomas Fribley	Expert	May Call
86.		Don Snell	Expert	May Call
87.		Kenneth B. Smith	Expert	May Call
88.		Dr. John W. Thompson	Expert	May Call
89.		Tony Watson	Expert	May Call
90.		H. James Wedner, M. D.	Expert	May Call
91.		Jaime Albrecht	Fact	May Call
92.		Jim Foltz	Fact	May Call
93.		Forest River Warranty Officer, yet to be designated	Fact	May Call
94.		Corporate Representative of Forest River, Doug Gaeddert	Fact	May Call
95.		Corporate Representative of Forest River, yet to be designated	Fact	May Call
96.		Any and all witnesses who may be identified or discovered on the basis of Defendant's responses to discovery propounded by Plaintiff or depositions taken during discovery in this matter	Fact/Expert	May Call
	Shaw			
	Environmental:			
97.		John D. Oстераas	Expert	May Call
98.		Corporate Representative of Shaw Environmental	Fact	May Call
99.		Project Manager of Shaw Environmental	Fact	May Call
100.		Any and all witnesses who may be identified or discovered on the basis of Defendant's responses to discovery propounded by Plaintiff or depositions taken during discovery in this matter	Fact/Expert	May Call
	Vendors/Suppliers			

101.		Any and all witnesses who may be identified or discovered on the basis of Defendants' responses to discovery propounded by Plaintiff or depositions taken during discovery in this matter	Fact/Expert	May Call
	Other:			
102.		Corporate Representative of Lippert Components	Fact	May Call (By Deposition)
103.		Corporate Representative of RCG Enterprises	Fact	May Call (By Deposition)
104.		Representative of NACS	Fact	May Call (By Deposition)
105.		Representative of RVIA	Fact	May Call (By Deposition)
106.		Formaldehyde Counsel	Fact	May Call (By Deposition)
107.		Any and all witnesses who may be identified or discovered on the basis of Defendants' responses to discovery propounded by Plaintiff or depositions taken during discovery in this matter	Fact/Expert	May Call
108.		Any and all witnesses necessary to rebut any other party or witness	Fact/Expert	May Call
109.		Any and all witnesses listed by any other party in this action	Fact/Expert	May Call

Plaintiff respectfully reserves the right to utilize any exhibit listed by any other party or utilized as an exhibit in the depositions taken in this matter. Plaintiff further respectfully reserves the right to supplement and amend this list once discovery is complete.

RESPECTFULLY SUBMITTED:

**FRANK J. D'AMICO, JR.,
APLC**

BY: s/Frank J. D'Amico, Jr.
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Counsel for Lyndon Wright

CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2010 I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record who are CM/ECF participants. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to all counsel of record who are non-CM/ECF participants.

s/Frank J. D'Amico
FRANK J. D'AMICO, #17519