

**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 EXHIBIT 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 Exhibit List in connection with the above-captioned matter, to be supplemented by ongoing production, depositions and discovery:

Exhibit ID	Category:	Exhibit Description:
Plaintiff's Exhibits		
	Governmental Agency Reports and Studies	
1.		CDC Summary and Interim Report: VOC and Aldehyde Emissions in Four FEMA Temporary Housing Unites – Indoor Environment Department, Lawrence Berkeley National Laboratory, 8 May, 2008
2.		U.S. Department of Health and Human Services and CDC Presentation Titled "Formaldehyde Levels in Occupied FEMA-supplied Temporary Housing Units (THUs) in LA and MS, Winter 2007-2008"
3.		CDC Interim findings on Formaldehyde Levels in FEMA-Supplied Travel Trailers, Park Models, and Mobile Homes-February 29, 2008
4.		Agency for Toxic Substances and Disease Registry (ATSDR) "Health Consultations, Formaldehyde Sampling at FEMA Temporary Housing Units, Baton Rouge, Louisiana, February 1, 2007

5.		ATSDR October 2007 “An Update and Revision of ATSDR’s February 2007 Health Consultation: Formaldehyde Sampling of FEMA Temporary-Housing Trailers Baton Rouge, Louisiana, September – October 2006”
6.		Statement of Harvey E. Johnson, Jr., Acting Deputy Administrator and Chief Operating Officer for FEMA before the U.S. Senate Subcommittee on State, Local, and Private Sector Preparedness and Integration, March 4, 2008
7.		Statement of R. David Paulison, FEMA Administrator, before the U.S. House of Representatives Committee on Oversight and Government Reform, July 19, 2007
8.		“Formaldehyde Exposure in Homes: A Reference for State Officials to Use in Decision-Making” published in March 2008 by the DHHS, CDC, DHS, FEMA and the EPA
9.		U.S. EPA “Indoor Air Quality” Basic Information for Formaldehyde-Last updated November 14, 2007
10.		“Formaldehyde Levels in FEMA-Supplied Trailers-Early Findings from the Centers for Disease Control and Prevention”
11.		ASTM Standard Test Method for Determining Formaldehyde concentrations in Air and Emission Rates in Wood Products Using a Large Chamber (2002)
12.		Indoor Air Quality and Health in FEMA Temporary Housing for Trailer Residents prepared by CDC
13.		Trailer Manufacturers and Elevated Formaldehyde Levels Majority Staff Analysis, Committee on Oversight and government Reform, U.S. House of Representatives dated on July 9, 2008
14.		ASHRAE Handbook, 2007: HVAC Applications, Chapter One: Residences
15.		Department of Homeland Security, Office of Inspector General: FEMA’s Response to Formaldehyde in Trailers dated June, 2009
16.		Majority Staff Report Subcommittee on Investigations & Oversight – Committee on Science & Technology U.S. House of Representatives, September 2008, “Toxic Trailers-Toxic Lethargy: How the Centers for Disease Control and Prevention Has Failed to Protect the Public Health”
	Standards, Regulations, and Statutes	
17.		2 C.F.R. § 3280.309, Health Notice on formaldehyde emissions Current through November 6, 2008
18.		§3280.309 – 24 CFR Ch. XX, Health Notice on Formaldehyde emissions (4-1-07)
19.		ATSDR Formaldehyde Minimal Risk Levels and Worksheets – Appendix A
20.		U.S. Department of Housing and Urban Development Rules and Regulations regarding Formaldehyde, 49 FR 31996
21.		California air Resources Board’s (CARB) Standards
22.		Occupational Safety and Health Administration’s (OSHA) Standards for Formaldehyde

23.		American Conference of Governmental Industrial Hygienists' (ACGIH) Standards for Formaldehyde
24.		National Institute of Occupational Safety and Health's (NIOSH) Standards for Formaldehyde
25.		Housing and Urban Development's (HUD) Standards for Formaldehyde (including but not limited to 24 C.F.R. § 3280.308)
26.		World Health Organization (WHO) and Health Canada's Standards for Formaldehyde
27.		American National Standard (ANSI) for Medium Density Fiberboard dated February 4, 1994
28.		American National Standard (ANSI) for Particleboard dated February 8, 1999
29.		ANSI A119.2, NFPA 1192: Standard on Recreational Vehicles; 2002 Edition
30.		ANSI A119.4, NFPA 1194: Standard on Recreational Vehicle Parks and Campgrounds; 2002 Edition
31.		ANSI/HPVA HP-1; American National Standard for Hardwood and Decorative Plywood
32.		Toxicological Profile on Formaldehyde prepared by ATSDR on July 1999
33.		Codes and Standards for Recreational Vehicles ANSI 119.2, NFPA 1192.
34.		Any and all standards adopted and/or in use from 2005 to present by the Recreational Vehicle Industry Association (RVIA)
35.		Building Code of the City of New Orleans, Louisiana
36.		International Building Code
37.		International Residential Code
38.		ASCE 7
39.		ASTM A-36
40.		FEMA Model Travel Trailer Procurement Specifications
41.		Clean Air Act Extension of 1970
42.		Clean Air Act Amendments of 1990
43.		New Source Performance Standards (NSPS)
44.		National Emissions Standards for Hazardous Air Pollutants (NESHAP)
45.		National Ambient Air Quality Standards (NAAQS)
46.		OSHA Formaldehyde Standards
47.		World Health Organization, 2000, Air Quality Guidelines for Europe; General Public
48.		Health Canada, Residential Indoor Air Quality Guidelines; General Public
49.		Suburban Manufacturing Corporation's Manufacturer's Instructions
50.		September 1, 2005, Memo from Doug Gaeddert to Mike Farrell at NACS
51.		National Electrical Code; Article 551
52.		NISOH Pocket Guide to Chemical Hazards, 2005
53.		Any and all Federal, State, Local, and Industry Regulations and Guidelines discussed and relied upon by any Defendant and/or Plaintiff experts in this matter.
	Articles	
54.		July 20, 2007 "Formaldehyde and FEMA Trailers" by Lee Shull, Ph.D

55.		Maddalena, Randy; Russell, Marion; Sullivan, Douglas P.; and Apte, Michael G. "Aldehyde and Other volatile Organic Chemical Emissions in Four FEMA Temporary Housing Units-Final Report"-Ernest Orlando Lawrence Berkeley National Laboratory, November 2008
56.		"Effect of Formaldehyde Inhalation on Hsp70 in Seminiferous Tubules of rat testes: an immunohistochemical study" by O. Ozen, et al. (2005)
57.		"Formaldehyde and Glutaraldehyde and nasal Cytotoxicity: Case Study within the Context of the 2006 IPCS Human Framework for the Analysis of a Cancer Mode of Action for Humans" by D. McGregor, et al.
58.		"Effects of Inhaled Formaldehyde on Learning and Memory of Mice" by Z. Lu, et al. (2008)
59.		"Low Concentrations of Formaldehyde induce DNA damage and delay DNA repair after UV irradiation in Human Skin Cells" by G. Emri, et al. (2004)
60.		National Cancer Institute (NCI): Fact Sheet: Formaldehyde and Cancer Risk dated May 7, 2009
61.		National Cancer Institute (NCI): Formaldehyde Exposure among Industrial Workers is Associated with Increased Risk of Cancers of the Blood and Lymphatic System dated May 12, 2009
62.		FEMA media release: FEMA Awards Contracts for Low Emissions Travel Trailers – April 7, 2009 – Release No. HQ-09-034b
63.		FEMA media release: FEMA to Introduce New Type of Manufactured Home – Dec. 18, 2008 – Release No. 1791-343
64.		Article – "Formaldehyde Exposure in Nonoccupational Environments" by K. Dally, et al.
65.		Article – "Formaldehyde-related Health Complaints of Residents Living in Mobile and Conventional Homes" by I. Ritchie, et al.
66.		Article – FEMA rolls out new disaster mobile homes: Formaldehyde levels are far below those of Hurricane Katrina, Rita trailers dated 05/14/09
67.		Fact Sheet: Airborne Toxic Control Measure (ATCM) to Reduce Formaldehyde Emissions from Composite Wood Products
68.		Environmental Health – Formaldehyde Exposure in Homes: A Reference for State Officials to Use in Decision-Making (March 2008)
69.		Environmental Health – What you should know about Formaldehyde in Mobile Homes
70.		Formaldehyde Levels in FEMA-Supplied Trailers; Early Findings from the Centers for Disease Control and Prevention
71.		"Formaldehyde Indoors" by Dr. Stephen Smulski, April 1987, Progressive Builder, 12(4):9-11.
72.		Boyson, M. "Nasal mucosa in workers exposed to formaldehyde: a pilot study." Br J of Ind Med 47:116-121, 1990
73.		Edling, C. "Occupational exposure to formaldehyde and histopathological changes in nasal mucosa." Br J of Ind Med 45:761-765, 1988
74.		Holmstrom, M. "Histological Changes in the Nasal Mucosa in Rats after Long-term Exposure to Formaldehyde and Wood Dust." Acta Otolaryngol (Stockh) 108:274-283, 1989

75.		Holmstrom, M. "Histological Changes in the Nasal Mucosa in Persons Occupationally Exposed to Formaldehyde Alone and in Combination with Wood Dust." Acta Otolaryngol (Stockh) 107:120-129, 1989
76.		Garrett, MH. "Increased risk of allergy in children due to formaldehyde exposure in homes." Allergy 1999; 54(4):330-7.
77.		Jaakkola, JJ. "Asthma, Wheezing, and Allergies in Russian Schoolchildren in Relation to New Surface Materials in the Home." Am J Public Health 2004;94(4):560-2
78.		Platts-Mills, TA. "Indoor allergens and asthma: Report of the Third International Workshop." J Allergy Clin Immunol 1997;100(6 Pt 1):S2-S24.
79.		"Legacy of Shame: The On-Going Public Health Disaster of Children Struggling in Post-Katrina Louisiana." Children's Health Fund & Columbia Univ. Mailman School of Public Health, Nov. 4, 2008
80.		"Children from FEMA trailer park battle serious health problems" USA Today 11/24/08
81.		Wantke, F, "Exposure to gaseous formaldehyde induces IgE-mediated sensitization to formaldehyde in school-children" Clinical and Experimental Allergy, 1996, Vol. 26, pages 276-280
82.		Krzyzanowski, Michal, "Chronic Respiratory Effects of Indoor Formaldehyde Exposure" Environmental Research 52, 117-125 (1990)
83.		"Indoor Residential Chemical Emissions as Risk Factor for Children's Respiratory Health" by M. Mendell
84.		"Formaldehyde and Leukemia: Epidemiology, Potential Mechanisms, and Implications for Risk Assessment" by Zhang, et al.
85.		"Formaldehyde-releasers: relationship to formaldehyde contact allergy. Contact allergy to formaldehyde and inventory of formaldehyde-releasers" by Groot, et al.
86.		"Prospective study of clinical symptoms and skin test reactions in medical students exposed to formaldehyde gas" by Takahashi, et al.
87.		"Influence of airborne nitrogen dioxide or formaldehyde on parameters of skin function and cellular activation in patients with atopic eczema and control subjects" by Eberlein-Konig, et al.
88.		Any and all articles identified and/or relied upon by Plaintiff and/or Defendant experts in the preparation of their reports.
	Expert Records and Files	
89.		Affidavit of Lee E. Branscome, Ph.D., C.C.M.
90.		Curriculum Vitae of Lee E. Branscome, Ph.D., C.C.M.
91.		Weather data from Dr. Lee Branscome for New Orleans, Louisiana and Lottie, Louisiana
92.		Medical Records of Lyndon Wright and file of George Farber, M.D.
93.		Affidavits of Paul Hewett, Ph.D.
94.		Curriculum Vitae of Paul Hewitt, Ph.D.
95.		Reliance Materials and File of Paul Hewitt, Ph.D.
96.		Deposition Testimony of Paul Hewitt, Ph.D.
97.		Exhibits from the deposition of Paul Hewitt, Ph.D
98.		Affidavits of Kenneth Laughery, Ph.D.

99.		Curriculum Vitae of Kenneth Laughery, Ph.D.
100.		Reliance Materials and File of Kenneth Laughery, Ph.D.
101.		Deposition Testimony of Kenneth Laughery, Ph.D.
102.		Exhibits from the deposition of Kenneth Laughery, Ph.D.
103.		Affidavits of Alexis Mallet, Jr.
104.		Curriculum Vitae of Alexis Mallet, Jr.
105.		Reliance Materials and File of Alexis Mallet, Jr., including thermographs and photographs
106.		Trailer drawings by Alexis Mallet, Jr.
107.		Deposition Testimony of Alexis Mallet, Jr.
108.		Exhibits from the deposition of Alexis Mallet, Jr.
109.		Affidavits of Lawrence G. Miller, M.D., M.P.H.
110.		Curriculum Vitae of Lawrence G. Miller, M.D., M.P.H.
111.		Reliance Materials and File of Lawrence G. Miller, M.D., M.P.H.
112.		Deposition Testimony of Lawrence G. Miller, M.D., M.P.H.
113.		Exhibits from the deposition of Lawrence G. Miller, M.D., M.P.H.
114.		Affidavits of Charles David Moore, P.E. P.L.S.
115.		Curriculum Vitae of Charles David Moore, P.E. P.L.S.
116.		Reliance Materials and File of Charles David Moore, P.E.
117.		Deposition Testimony of Charles David Moore, P.E.
118.		Exhibits from the deposition of Charles David Moore, P.E.
119.		Affidavits of Ervin Ritter, P.E.
120.		Curriculum Vitae of Ervin Ritter, P.E.
121.		Reliance Materials and File of Ervin Ritter, P.E.
122.		Deposition Testimony of Ervin Ritter, P.E.
123.		Exhibits from the deposition of Ervin Ritter, P.E.
124.		Affidavits of William D. Scott, P.E., C.H.M.M.
125.		Curriculum Vitae of William D. Scott, P.E., C.H.M.M.
126.		Reliance Materials and File of William D. Scott, P.E., C.H.M.M.
127.		Deposition Testimony of William D. Scott, P.E. C.H.M.M.
128.		Exhibits from the deposition of William D. Scott, P.E., C.H.M.M.
129.		Microbial Growth Report by W.D. Scott and Associates
130.		Affidavits of Edward H. Shwery, Ph.D.
131.		Curriculum Vitae of Edward H. Shwery, Ph.D.
132.		Reliance Materials and File of Edward H. Shwery, Ph.D.
133.		Deposition Testimony of Edward H. Shwery, Ph.D.
134.		Exhibits from the deposition of Edward H. Shwery, Ph.D.
135.		Affidavits of Stephen Smulski, Ph.D.
136.		Curriculum Vitae of Stephen Smulski, Ph.D.
137.		Reliance Materials and File of Stephen Smulski, Ph.D.
138.		Deposition Testimony of Stephen Smulski, Ph.D.
139.		Exhibits from the deposition of Stephen Smulski, Ph.D.
140.		Affidavits of Patricia M. Williams, Ph.D. D.A.B.T.
141.		Curriculum Vitae of Patricia M. Williams, Ph.D., D.A.B.T.
142.		Reliance Material and File of Patricia M. Williams, Ph.D., D.A.B.T.
143.		Deposition Testimony of Patricia M. Williams, Ph.D., D.A.B.T.
144.		Exhibits from the deposition of Patricia M. Williams, Ph.D., D.A.B.T.

145.		Affidavits of Paul LaGrange
146.		Curriculum Vitae of Paul LaGrange
147.		Reliance Materials and File of Paul LaGrange
148.		Deposition Testimony of Paul LaGrange
149.		Exhibits from the deposition of Paul LaGrange
150.		Affidavits of Dr. Richard A Spector
151.		Curriculum Vitae of Dr. Richard A. Spector
152.		Reliance Materials and File of Dr. Richard A. Spector
153.		Deposition Testimony of Dr. Richard A. Spector
154.		Exhibits from the deposition of Dr. Richard A. Spector
155.		Any supplemental Affidavits or Reliance Material by Plaintiff's or Defendants' Experts
156.		Any deposition testimony provided by any and all plaintiff and/or deposition fact and/or expert witness in this matter.
157.		Any and all demonstrative evidence to be developed and/or utilized by Plaintiff's experts at trial
158.		Any additional exhibits identified at deposition of any expert or fact witness in this matter.
	Testing Database	
159.		Formaldehyde Testing Database prepared by the PSC
	Inspection in Melville, LA	
160.		Photographs taken by Plaintiffs/Plaintiff's Experts during destructive testing at FEMA Staging/Storing Facility in Melville, Louisiana.
161.		Video taken by Plaintiff/Plaintiff's Experts during the destructive testing at FEMA Staging/Storage Facility in Melville, Louisiana.
162.		Photographs taken by Defendants/Defendants' Experts during destructive testing.
163.		Video taken by Defendants/Defendants' Experts during destructive testing.
164.		Animations created by C4 Animation (Reagan Johnson)
165.		Test results of testing performed by Tony Watson, on behalf of Defendant, Forest River, Inc., on the Wright travel trailer
166.		Results of all testing and inspection of the Forest River/Wright unit including, but not limited to, air sampling, temperature, humidity, and photographs thereof
167.		Test Results of formaldehyde testing by WD Scott Group during destructive testing.
168.		Test Results of mold sampling performed by WD Scott Group during destructive testing.
169.		Test Results of mold sampling taken by Defendants' Experts during destructive testing.
170.		Air Sampling Results of October 2008 testing of the Lyndon Wright unit.
171.		Exemplar of a Personal Monitoring System for Aldehydes (Exemplar Passive Dosimeter)
172.		Exemplars of Various Component Wood Products from Lyndon Wright Forest River Travel Trailer.

173.		Exemplars of Alternative Wood Products from Lyndon Wright Forest River Travel Trailer.
174.		All measurements and graphic representations of Lyndon Wright trailer
	Forest River, Inc.	
175.		Forest River, Inc., Lyndon Wright trailer unit file
176.		Any and all Class certification Forest River deposition testimony
177.		Any and all Class certification Forest River deposition exhibits / documents produced
178.		Forest River Owner's Manual
179.		FEMA Specifications
180.		NACS Correspondence and Solicitation
181.		Any and all Internal emails and communications relevant to FEMA production
182.		Any and all Deposition Testimony of Elton Kiefer
183.		Any and all Exhibits from the deposition(s) of Elton Kiefer
184.		Any and all Deposition Testimony of Jeff Burrian
185.		Any and all Exhibits from the deposition(s) of Jeff Burrian
186.		Affidavits of Norman Nelson
187.		Curriculum Vitae of Norman Nelson
188.		Reliance Materials and File of Norman Nelson
189.		Any and all Deposition Testimony of Norman Nelson
190.		Any and all Exhibits from the deposition(s) of Norman Nelson
191.		Affidavits of G. Graham Allan
192.		Curriculum Vitae of G. Graham Allan
193.		Reliance Materials and File of G. Graham Allan
194.		Any and all Deposition Testimony of G. Graham Allan
195.		Any and all Exhibits from the deposition(s) of G. Graham Allan
196.		Affidavits of Philip Cole, M.D.
197.		Curriculum Vitae of Philip Cole, M.D.
198.		Reliance Materials and File of Philip Cole, M.D.
199.		Any and all Deposition Testimony of Philip Cole, M.D.
200.		Any and all Exhibits from the deposition(s) of Philip Cole, M.D.
201.		Affidavits of Nathan T. Dorris
202.		Curriculum Vitae of Nathan T. Dorris
203.		Reliance Materials and File of Nathan T. Dorris
204.		Any and all Deposition Testimony of Nathan T. Dorris
205.		Any and all Exhibits from the deposition(s) of Nathan T. Dorris
206.		Affidavits of William L. Dyson
207.		Curriculum Vitae of William L. Dyson
208.		Reliance Materials and File of William L. Dyson
209.		Any and all Deposition Testimony of William L. Dyson
210.		Any and all Exhibits from the deposition(s) of William L. Dyson
211.		Affidavits of Thomas Fribley
212.		Curriculum Vitae of Thomas Fribley
213.		Reliance Materials and File of Thomas Fribley
214.		Any and all Deposition Testimony of Thomas Fribley

215.		Any and all Exhibits from the deposition(s) of Thomas Fribley
216.		Affidavits of Don Snell
217.		Curriculum Vitae of Don Snell
218.		Reliance Materials and File of Don Snell
219.		Any and all Deposition Testimony of Don Snell
220.		Any and all Exhibits from the deposition(s) of Don Snell
221.		Affidavits of Kenneth B. Smith
222.		Curriculum Vitae of Kenneth B. Smith
223.		Reliance Materials and File of Kenneth B. Smith
224.		Any and all Deposition Testimony of Kenneth B. Smith
225.		Any and all Exhibits from the deposition(s) of Kenneth B. Smith
226.		Affidavits of Dr. John W. Thompson
227.		Curriculum Vitae of Dr. John W. Thompson
228.		Reliance Materials and File of Dr. John W. Thompson
229.		Any and all Deposition Testimony of Dr. John W. Thompson
230.		Any and all Exhibits from the deposition(s) of Dr. John W. Thompson
231.		Affidavits of Tony Watson
232.		Curriculum Vitae of Tony Watson
233.		Reliance Materials and File of Tony Watson
234.		Any and all Deposition Testimony of Tony Watson
235.		Any and all Exhibits from the deposition(s) of Tony Watson
236.		Affidavits of H. James Wedner, M.D.
237.		Curriculum Vitae of H. James Wedner, M.D.
238.		Reliance Materials and File of H. James Wedner, M.D.
239.		Any and all Deposition Testimony of H. James Wedner, M.D.
240.		Any and all Exhibits from the deposition(s) of H. James Wedner, M.D.
241.		Any and all Deposition Testimony of Jaime Albrecht
242.		Any and all Exhibits from the deposition(s) of Jaime Albrecht
243.		Any and all Deposition Testimony of Jim Foltz
244.		Any and all Exhibits from the deposition(s) of Jim Foltz
245.		Any and all Deposition Testimony of Forest River Warranty Officer, yet to be designated
246.		Any and all Exhibits from the deposition(s) of Forest River Warranty Deponent, yet to be designated
247.		Any and all Deposition Testimony of Corporate Representative of Forest River, Doug Gaeddert
248.		Any and all Exhibits from the deposition(s) of Corporate Representative of Forest River, Doug Gaeddert
249.		Any and all Deposition Testimony of any and/or all Corporate Representative of Forest River, yet to be designated
250.		Any and all Exhibits from the deposition(s) of any and/or all Corporate Representative of Forest River, yet to be designated
251.		Any and all documentation identified by defendant's experts in the preparation of their reports and/or testimony.
252.		Any and all exhibits identified and/or used and/or relied upon by defendant's in the ongoing litigation of this matter.
253.		Blueprints of Forest River 32 BHLE FEMA units

254.		Component part lists of 32 BHLE units
255.		Internal Forest River Memorandum regarding proposed production schedule
256.		September 1, 2005, NACS/FEMA Solicitation and Specifications
257.		Handwritten designs, drawings, and notes for FEMA units
258.		NACS/Forest River FEMA Specifications documents
259.		2004 Email from NACS to Forest River regarding FEMA Trailer Production Specifications
260.		November 2006 Elton Kiefer notes regarding Patrick and Adorn switching to LFE in early 2007
261.		September 1, 2005 email Ty Miller to Doug Gaeddert and Tom Martin regarding California production
	U.S.A.	
262.		U.S.A. / FEMA Disaster File for Bobbi Wright and/or Lyndon Wright
263.		Affidavits of Robert James, Ph.D.
264.		Curriculum Vitae of Robert James, Ph.D.
265.		Reliance Materials and File of Robert James, Ph.D.
266.		Any and all Deposition Testimony of Robert James, Ph.D.
267.		Any and all Exhibits from the deposition(s) of Robert James, Ph.D.
268.		Affidavits of Bruce Kelman, Ph.D.
269.		Curriculum Vitae of Bruce Kelman, Ph.D.
270.		Reliance Materials and File of Bruce Kelman, Ph.D.
271.		Any and all Deposition Testimony of Bruce Kelman, Ph.D.
272.		Any and all Exhibits from the deposition(s) of Bruce Kelman, Ph.D.
273.		Affidavits of Michael Lindell, Ph.D.
274.		Curriculum Vitae of Michael Lindell, Ph. D.
275.		Reliance Materials and File of Michael Lindell, Ph.D.
276.		Any and all Deposition Testimony of Michael Lindell, Ph.D.
277.		Any and all Exhibits from the deposition(s) of Michael Lindell, Ph.D.
278.		Affidavits of Richard Monson, M.D., Sc.D.
279.		Curriculum Vitae of Richard Monson, M.D., Sc.D.
280.		Reliance Materials and File of Richard Monson, M.D., Sc.D.
281.		Any and all Deposition Testimony of Richard Monson, M.D., Sc.D.
282.		Any and all Exhibits from the deposition(s) of Richard Monson, M.D., Sc.D.
283.		Affidavits of Mark Polk
284.		Curriculum Vitae of Mark Polk
285.		Reliance Materials and File of Mark Polk
286.		Any and all Deposition Testimony of Mark Polk
287.		Any and all Exhibits from the deposition(s) of Mark Polk
288.		Affidavits of Coreen Robbins, M.H.S., Ph.D., C.I.H.
289.		Curriculum Vitae of Coreen Robbins, M.H.S., Ph.D., C.I.H.
290.		Reliance Materials and File of Coreen Robbins, M.H.S., Ph.D., C.I.H.
291.		Any and all Deposition Testimony of Coreen Robbins, M.H.S., Ph.D., C.I.H.
292.		Any and all Exhibits from the deposition(s) of Coreen Robbins, M.H.S., Ph.D., C.I.H.

293.		Any and all Deposition Testimony of Dr. Christopher DeRosa
294.		Any and all Exhibits from the deposition(s) of Dr. Christopher DeRosa
295.		FEMA Storage Site Duties/Responsibilities regarding Forest River, Inc.
296.		FEMA Model Travel Trailer Procurement Specifications dated 08-12-2004 (HSFE04-04-Q-800)
297.		FEMA Accessible Model Travel Trailer Procurement Specifications dated 04-21-2006 (with Accessible One Bedroom Travel Trailer Floor plan)
298.		“Important Information for Travel Trailer Occupants” FEMA brochure
299.		FEMA Model Travel Trailer Procurement Specifications Dated: July 14, 2005
300.		Declaration of Kevin Souza, former Acting Deputy Director of Individual Assistance Division of FEMA
301.		“FEMA Storage Site Duties/Responsibilities”
302.		April 25, 2008 letter from FEMA to a THU occupant
303.		Summary of Test Results conducted by Weston Solutions, Inc. for the U.S. EPA
304.		Air Toxics, Ltd. Laboratory Narrative for samples submitted by Weston Solutions
305.		FEMA test results for formaldehyde testing at FEMA THU staging areas during November 2005, December 2005, and January 2006
306.		FEMA Memorandum from May 31, 2006 regarding Formaldehyde Air Sampling at the THU staging area in Purvis, Mississippi
307.		Email correspondence between FEMA and Government staff
308.		FEMA Job Hazard Analysis Worksheet
309.		FEMA Model Travel Trailer Procurement Specifications dated August 12, 2004
310.		New FEMA Procurement Specifications dated April 11, 2008 Release Number HQ-08-056
311.		FEMA Formaldehyde Timeline as of June 15, 2007
312.		FEMA Timeline as of August 7, 2008 (From the deposition of Kevin Souza, FEMA Representative)
313.		FEMA Procedure Storage Site Manual Fall 2005
314.		Dept of Homeland Security-Office of Inspector General-Hurricane Katrina Temporary Housing Technical Assistance Contracts- August 20, 2008 (Internal Audit: OIG-08-88)
315.		FEMA Myths & Facts: Travel Trailers-November 8, 2007
316.		FEMA media release: Katrina/Rita Housing Facts-January 29, 2008
317.		FEMA media release: FEMA’s Ongoing Response to Formaldehyde-February 12, 2008
318.		FEMA media release: CDC Results of Formaldehyde Level Tests-February 14, 2008
319.		FEMA media release: FEMA Plan of Action on Formaldehyde Findings to be Implemented Immediately-February 14, 2008
320.		FEMA media release: FEMA Offering Formaldehyde Testing to Occupants of Trailers and Mobile Homes in Disasters Nationwide-February 22, 2008
321.		FEMA media release: FAQ: 2008 Disaster Housing Plan – June 10, 2008

322.		FEMA Statement on Formaldehyde – July 9, 2008
323.		FEMA media release: Myths & Facts about FEMA Housing Following Katrina-May 26, 2008
324.		FEMA media release: New Task Contract Awarded for Temporary Housing Units-August 4, 2008
325.		FEMA media release: Frequently Asked Questions-October 27, 2008
326.		FEMA media release: Initial Indoor Air Quality Tests Results-November 14, 2008
327.		FEMA media release: FAQ National Disaster Housing Strategy – January 16, 2009
328.		FEMA Statement on Travel Trailers and Formaldehyde
329.		Email from Christopher DeRosa to Howard Frumkin on February 27, 2007
330.		Correspondence from Christopher DeRosa to Patrick Preston on February 27, 2007
331.		Email from Christopher DeRosa to Howard Frumkin and Thomas Sinks on March 9, 2007
332.		Email from Christopher DeRosa to Mike Groutt on August 10, 2007
333.		Comments on Chronology of FEMA Trailers, drafted by Christopher DeRosa
334.		Correspondence from Christopher DeRosa to Howard Frumkin on September 21, 2007
335.		Email from Thomas Sinks to All CDC on October 12, 2007
336.		NCEH/ATSDR Procedures regarding Official Interaction with Persons or organization outside of NCEH/ATSDR
337.		Logbook of Joseph Little
338.		Email from Patrick Preston to Scott Wright on November 30, 2005
339.		Email from Scott Wright and Joseph Little to Richard Nikel, et al., on December 7, 2006
340.		Correspondence between Barbara Rogers to Angela Davis and Sascha Fielding on March 21, 2007
341.		Email of Mary Margaret Walker (FEMA-WAXMAN-7-26-07 Production – 485)
342.		Correspondence From Mark Keim to Patrick Preston on March 17, 2007
343.		Correspondence from Patrick Preston to Scott Wright on November 30, 2005
344.		Email between Sam Coleman, Joseph Little and Scott Wright on December 1, 2006
345.		Correspondence from Mark Keim to Patrick Preston on February 1, 2007
346.		Email to and from Philip Allred on February 15, 2007
347.		Email from Anne Sowell to Mark Bashor on August 8, 2007
348.		Email between Patrick Preston and Margaret Ramos on February 27, 2007
349.		Email between David Chawaga and Mary Margaret Walker on May 1, 2007
350.		FEMA: Interim Direction on use of Temporary Housing Units (Revision Effective Date: March 10, 2008)

351.		FEMA: FEMA Begins Next Phase of Inventory Reduction of Excess Temporary Housing Units
352.		"FEMA: Important Formaldehyde Information fro FEMA Housing Occupants:
353.		"FEMA Travel Trailer Requirements"
354.		Any and all documents produced by Dr. Christopher DeRosa at his deposition, which will be taken/has been taken, or used as exhibits thereto
355.		Flyer: "CDC will test Trailers and Mobile Homes for Formaldehyde for CDC Partners such as Community Organizations in Louisiana and Mississippi" dated December 2007
356.		Script for Formaldehyde Concerns in Temporary Housing Unit: IA recipients with questions about formaldehyde, July 2007
357.		Applicants Reporting MH/TT Formaldehyde Issues: IA recipients with questions about formaldehyde, July 2007
358.		Lottie Travel Trailer (Receiving) Inspection Checklist
359.		FEMA Brochure: "Important Information for Travel Trailer Occupants"
360.		FEMA: Important Formaldehyde Information for FEMA Housing Occupants
361.		Email from Martin McNeese dated October 11, 2006
362.		Email from Curtis Melnick dated May 11, 2006
363.		Memo from FEMA Temporary Housing Agent Group: Occupants with questions about Formaldehyde regarding Formaldehyde-Help-line Calls, Referrals and Transfers dated July 2007
364.		FEMA Internal documents regarding formaldehyde
365.		Emails regarding Katrina and Rita housing estimates dated November 1, 2005
366.		Assessment of health Complaints among Pediatric Residents of FEMA-Supplied Trailers and Mobile Homes in Hancock County, Mississippi (Exhibit from the deposition of Michael Lapinski)
367.		Fact Sheet: Assessment of Health Complaints Among Children Living in FEMA Temporary Housing Units in Hancock county, Mississippi (Exhibit from the deposition of Michael Lapinski)
368.		Any and all documentation and/or exhibits identified by defendant's experts and/or fact witness in the preparation of their reports and/or testimony.
369.		Any and all exhibits identified and/or used and/or relied upon by defendant's in the ongoing litigation of this matter.
	Shaw Environmental	
370.		Any and all Class certification Shaw Environmental deposition testimony
371.		Any and all Class certification Shaw Environmental deposition exhibits / documents produced
372.		Shaw Environmental file on Lyndon Wright unit
373.		Shaw / FEMA contract
374.		All FEMA task orders to Shaw Environmental
375.		All FEMA extension of time orders to Shaw Environmental
376.		All FEMA Amendments or Modifications to Shaw Environmental contract

377.		All Shaw Environmental work plans produced to Plaintiff
378.		Subcontractor agreement with installer of Wright unit
379.		Affidavits of John D. Oстераas
380.		Curriculum Vitae of John D. Oстераas
381.		Reliance Materials and File of John D. Oстераas
382.		Any and all Deposition Testimony of John D. Oстераas
383.		Any and all Exhibits from the deposition(s) of John D. Oстераas
384.		Any and all Deposition Testimony of Corporate Representative of Shaw Environmental, yet to be designated
385.		Any and all Exhibits from the deposition(s) of Corporate Representative of Shaw Environmental, yet to be designated
386.		Any and all Deposition Testimony of Project Manager of Shaw Environmental, yet to be designated
387.		Any and all Exhibits from the deposition(s) of Project Manager of Shaw Environmental, yet to be designated
388.		Any and all additional documents not yet produced in this matter
389.		Any and all documentation and/or exhibits identified by defendant's experts and/or fact witness in the preparation of their reports and/or testimony.
390.		Any and all exhibits identified and/or used and/or relied upon by defendant's in the ongoing litigation of this matter.
	Wright Unit	
391.		Photographs taken by or in the possession of Wright of the Forest River, Inc., unit
392.		Any and all labels or stickers on the Forest River, Inc., unit occupied by Lyndon Wright
	Wright File	
393.		Photographs of Lyndon Wright regarding skin conditions
394.		Lyndon Wright Financial Records
395.		Lyndon Wright Employment Records
	Medical Records	
396.		Medical Records from Dr. Farber regarding Lyndon Wright
397.		Medical Records from Kenner Dermatology / Gulf South Medical and Surgical Institute regarding Lyndon Wright
398.		Medical Records from Uptown Nephrology regarding Lyndon Wright
399.		Medical Records from Dr. Richard Spector regarding Lyndon Wright
400.		Pharmacy Records regarding Lyndon Wright
	Others	
401.		Any and all Deposition Testimony of Representative of NACS, yet to be designated
402.		Any and all Exhibits from the deposition(s) of Representative of NACS, yet to be designated
403.		Any and all Deposition Testimony of Representative of RVIA, yet to be designated
404.		Any and all Exhibits from the deposition(s) of Representative of RVIA, yet to be designated

405.		Any and all Deposition Testimony of Representative of Lippert Components, yet to be designated
406.		Any and all Exhibits from the deposition(s) of Representative of Lippert Components, yet to be designated
407.		Any and all Deposition Testimony of Representative of RCG Enterprises, yet to be designated
408.		Any and all Exhibits from the deposition(s) of Representative of RCG Enterprises, yet to be designated
409.		Temporary Medical License for Dr. Lawrence Miller
410.		Louisiana State Board of Medical Examiners Temporary Permit Qualifications/Instructions
411.		BlueLinx Corporation: Material Safety Data Sheet for urea Formaldehyde Bonded Wood Products
412.		Georgia-Pacific: Material Safety Data Sheet for Urea Formaldehyde Bonded Wood Products
413.		Louisiana Pacific: Material Safety Data Sheet for Urea Formaldehyde Bonded Panel Products
414.		Lippert Component Frame Design for 32BHLE units
415.		Georgia Pacific: Material Safety Data Sheet #30 for UF Bonded Wood Products
416.		Georgia Pacific: Material Safety Data Sheet #31 for Wood and Wood Products
417.		Manufactured Home Decking Labels from Georgia Pacific
418.		City of New Orleans Environmental testing results and report responsive to Forest River, Inc., subpoena
419.		Any and all documentation and/or exhibits identified by defendant's experts and/or fact witness in the preparation of their reports and/or testimony.
420.		Any and all exhibits identified and/or used and/or relied upon by defendant's in the ongoing litigation of this matter.

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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CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2009, 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