

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

IN RE: FEMA TRAILER FORMALDEHYDE
PRODUCTS LIABILITY LITIGATION

* MDL NO. 1873
*
* SECTION "N" (5)
*
* JUDGE ENGELHARDT
*
* MAGISTRATE CHASEZ
*

THIS DOCUMENT IS RELATED TO:
Aldridge, et al. vs. Gulfstream Coach, Inc., et al.
Civil Action No. 07-9228
(Elisha Dubuclet on behalf of her minor child, Timia
Dubuclet vs. Fleetwood Enterprises, Inc., et al.)

REVISED JOINT PRE-TRIAL ORDER

1. PRE-TRIAL CONFERENCE

A Pre-Trial Conference in the above captioned matter occurred before this
Honorable Court on Thursday, November 19, 2009, at 9:00 a.m. at the United States District
Court for the Eastern District of Louisiana.

2. APPEARANCE OF COUNSEL

FOR PLAINTIFF, ELISHA DUBUCLET, ON BEHALF OF HER MINOR CHILD,
TIMIA DUBUCLET:

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On Behalf of Fleetwood Enterprises, Inc. and any other related entity

3. REPRESENTED PARTIES

A. PLAINTIFF ELISHA DUBUCLET, ON BEHALF OF HER MINOR CHILD, TIMIA DUBUCLET

Plaintiff Elisha Dubuclet, on behalf of her minor daughter, Timia Dubuclet, is a resident of the Parish of Orleans.

B. DEFENDANT, FLEETWOOD ENTERPRISES, INC.

Defendant Fleetwood Enterprises, Inc., is a Delaware corporation with its principal place of business in Riverside, California. Historically Fleetwood, through its manufacturing subsidiaries, built travel trailers, motor homes, and manufactured housing (mobile homes). In 2005, as a result of hurricanes Katrina and Rita striking the Gulf Coast, FEMA issued construction specifications and ordered travel trailers as temporary housing for individuals whose residences were rendered uninhabitable by the hurricanes. Between October 2005 and April 2006, Fleetwood, through its many travel trailers subsidiaries, built trailers in compliance with the FEMA specifications which were sold by it to a nonparty distributor Morgan Buildings & Spas, Inc., which in turn sold the units to FEMA. The Dubuclet Fleetwood Unit here at issue was manufactured in Longview, Texas in March 2006.

4. JURISDICTION

Jurisdiction is proper based on 28 U.S.C. §§ 1332 (diversity of citizenship).

Jurisdiction is not contested by Defendant.

5. PENDING MOTIONS

As of November 30, 2009 at 12:00 p.m., the following motions remain outstanding:

A. PLAINTIFF:

1. Plaintiff's Motion in Limine to Prohibit References to Formaldehyde in Food and Other Products (Doc. # 7282)
2. Plaintiff's Motion in Limine to Prohibit Narrative and/or Non-Responsive Testimony (Doc. # 7287)
3. Plaintiff's Motion in Limine to Prohibit References to Trailer Testing Not Performed (Doc. # 7286)
4. Plaintiff's Motion in Limine to Exclude Evidence, Testimony, and Argument Regarding Other Lawsuits or Claims (Or Absence of Other Claims or Lawsuits) (Doc. # 7288)
5. Plaintiff's Motion in Limine to Prevent any Mention of the Revocation of Treating Physician Dr. George Farber's Medical License (Doc. #7285)
6. Plaintiff's Motion in Limine to Prohibit Reference to Unrelated, Non-Pled Claims (Doc. #7284)

B. DEFENDANT, FLEETWOOD ENTERPRISES, INC.:

1. Fleetwood Enterprises, Inc.'s Motion in Limine to Limit the Testimony of Marco Kaltofen, P.E. filed on November 9, 2009 (Doc. #6661)
2. Fleetwood Enterprises, Inc.'s Motion to Exclude the Testimony of Plaintiff's Expert Alexis Mallet, Jr. filed on November 9, 2009 (Doc. #6655)
3. Fleetwood Enterprises, Inc.'s Motion to Exclude Dr. Lawrence G. Miller's Testimony filed on November 10, 2009 (Doc. #6665)
4. Fleetwood Enterprises, Inc.'s Motion to Limit Ervin L. Ritter, P.E.'s Testimony filed on November 9, 2009 (Doc. #6658)
5. Fleetwood Enterprises, Inc.'s Motion to Exclude Dr. Edward H. Shwery's Testimony filed on November 9, 2009 (Doc. #6662)

6. Fleetwood Enterprises, Inc.'s Motion for Partial Summary Judgment on Mental Anguish filed on November 9, 2009 (Doc. #6639)
7. Fleetwood Enterprises, Inc.'s Motion in Limine to Exclude Evidence, Testimony, and Argument regarding Other Lawsuits or Claims (Doc. #6898)
8. Fleetwood Enterprises, Inc.'s Motion in Limine to Exclude References to Travel Trailers Failing to Meet Housing Codes (Doc. #7194)
9. Fleetwood Enterprises, Inc.'s Motion to Exclude Certain Comments to the Jury (Doc. #7278)
10. Fleetwood Enterprises, Inc.'s Motion to Exclude References to Post-Katrina "Prototype" (Doc. #7195)
11. Fleetwood Enterprises, Inc.'s Motion in Limine to Exclude Evidence, Testimony and Argument Regarding Family Members (Doc. #7193)
12. Fleetwood Enterprises, Inc.'s Motion in Limine to Exclude to Prohibit any Testimony, Evidence or Argument Regarding any Non Party's Medical Issues (Doc. #7202)
13. Fleetwood Enterprises, Inc.'s Motion to Exclude Emails Regarding Harmful Chemicals Notice (Doc. #7279)

6. **BRIEF SUMMARY OF MATERIAL FACTS**

A. **PLAINTIFF'S SUMMARY OF THE FACTS**

As a result of Hurricane Katrina, Plaintiff and her minor daughter, Timia Dubuclet were displaced from their permanent home at 6046 Dorothea Street, New Orleans, Louisiana. Since their home and their belongings flooded and thus, their home was uninhabitable, Plaintiff and her family, including her minor daughter, Timia Dubuclet, received emergency housing assistance from FEMA. Plaintiff and her daughter were provided with a travel trailer manufactured by Defendant Fleetwood Enterprises, Inc. (hereinafter, "Fleetwood") on or about June of 2006, with Vehicle Identification Number

(VIN) 4CJ1F322764015272. This unit constitutes a product under the Louisiana Products Liability Act ("LPLA"). Plaintiff and her daughter, Timia, began living in the travel trailer on or about June of 2006 and resided continuously in the unit until approximately September of 2007.

Fleetwood had a duty to warn Plaintiff and her family about the dangers and risks of formaldehyde in the travel trailer; this duty was continuing in nature, and legally was owed to Plaintiff by Fleetwood during the entire period that Plaintiff and her family occupied this travel trailer. The exposure of Plaintiff and her daughter, Timia, to formaldehyde offgassing from the travel trailer resulted from the normal, foreseeable, and intended use of the travel trailer, without substantial alteration, in the condition in which Fleetwood sold the travel trailer. The design of the travel trailer, including the use of particle board, plywood, press board, other composite wood products and other products that contain formaldehyde or formaldehyde resins, is defective and posed an unreasonable risk of harm to Plaintiff and her daughter, Timia. The use of particle board, plywood, press board, and other composite wood products that contain formaldehyde constitutes a defect in composition or manufacture that posed an unreasonable risk of harm to Plaintiff and her daughter. The Fleetwood travel trailer was in a defective condition and was unreasonably dangerous under normal use at the time the travel trailer left Fleetwood's control. Plaintiff and her daughter were intended and foreseeable users of the travel trailer, and the damages and losses to Plaintiff reasonably could have been anticipated by Fleetwood.

The defects in the travel trailer are the result of and/or include, but are not limited to, the following:

1. failing to design the travel trailer so as not to emit dangerous levels of

- formaldehyde;
2. providing a travel trailer which, by virtue of its design and/or manufacture and/or composition, was unreasonably dangerous under reasonably anticipated use;
 3. providing a travel trailer which, by virtue of a lack of an adequate warning(s), was unreasonably dangerous under reasonably anticipated use;
 4. providing a travel trailer which did not conform to the express and/or implied warranties made by Fleetwood Enterprises, Inc. regarding its fitness for use as reasonably anticipated;
 5. failing to adequately test the travel trailer to properly evaluate the levels of emissions of formaldehyde under foreseeable conditions for extended periods of time;
 6. failing to adhere to any and all express warranties of fitness and safety for the travel trailer it manufactured and provided;
 7. in voluntarily adopting the HUD Standard and failing to comply with all of its requirements;
 8. in manufacturing a travel trailer with fewer windows than those needed to properly and adequately ventilate the trailer;
 9. in failing to conduct testing of travel trailers prior to shipping them from their plants;
 10. in failing to test the travel trailer for formaldehyde once becoming aware of same through the news media and other outlets; and
 11. in failing to provide Formaldehyde Abatement Kits to the travel trailer

occupants.

On behalf of her minor daughter, Plaintiff seeks compensatory damages for: physical pain and suffering; mental anguish and emotional distress; past, continuing and future medical expenses; the aggravation of Plaintiff's minor daughter's skin and other conditions; fear of cancer; the impairment of future wage-earning capacity and/or daily life activities suffered and to be suffered by Plaintiff's minor daughter.

B. DEFENDANT, FLEETWOOD ENTERPRISES, INC.'S SUMMARY OF THE FACTS

Since the 1950s, Fleetwood has been one of the country's leading manufacturers of travel trailers, and since the 1970s it has been providing emergency housing for disaster relief to both state and federal agencies. Since the late 1970s it has been aware of a limited number of odor and other complaints primarily from owners of manufactured housing and primarily prior to the availability of low formaldehyde emitting products from the wood products industry. Since the early 1980s Fleetwood has been an industry leader in using the low formaldehyde emitting board in all of its products, including travel trailers used by FEMA. In addition to using the low formaldehyde emitting wood products, Fleetwood is the only travel trailer manufacturer in the country to mandate that a warning about formaldehyde be placed not only in the owners manual but posted prominently in the bathroom of the trailer. One of the warnings posted in the Dubuclet unit may still be found in the unit on the inside of the bathroom vanity.

In March 2006, the specially designed handicapped unit with a slide out living space used by the Dubuclet's was built at Fleetwood's Plant 40 in Longview, Texas. The travel trailer was built to FEMA specifications and sold to Morgan who in turn sold the unit to FEMA. It was transported from Longview, Texas by truck and taken to a FEMA storage unit

in Six Flags Staging Area, Louisiana where it was inspected and accepted by Morgan representatives, and separately inspected and accepted by FEMA representatives. At FEMA's instruction, it was then delivered by a third party to the Dubuclet's private property at 6046 Dorothea Street, New Orleans, Louisiana where it was installed by a contractor, Fluor. In June 2006, the then seven year old Timia Dubuclet, her mother, brother, and grandmother moved into their Fleetwood trailer. The Dubuclets left their trailer and moved back into their home in September 2007.

As a result of living in the trailer, Timia Dubuclet claims that she suffered aggravation of her pre-existing eczema, a skin condition she was diagnosed with when she six (6) weeks old. In fact, Timia was taken to a doctor with her chief complaint being a skin problem some fifteen times prior to moving into the trailer, the last time being approximately one week before moving into the trailer. She did not go back to the doctor for a chief complaint of skin symptoms for ten (10) months after moving into her trailer and then returned to the doctor some six (6) months later - at or about the time she moved out of the trailer and back into her repaired homes. These were the only two (2) times, in some sixteen (16) months that she lived in the trailer, that she went to the doctor for her skin condition, and she only had one prescription filled for her skin condition the entire time she lived in the trailer. After moving out of the trailer, six (6) months passed before she again saw a doctor for a skin related issue. There is no indication in her medical records that any treating doctor associated her skin condition to her living in the trailer until plaintiffs' counsel raised the issue with her treating doctor in the summer of 2009. No medical doctor in the case presently contends that Ms. Dubuclet's eczema was caused by formaldehyde. Plaintiff's claims are limited to a claim that her skin condition was

aggravated by the low levels of gaseous formaldehyde in her unit.

Fleetwood denies that it did anything wrong in connection with the design, manufacture, and sale of the Dubuclet unit and denies that it failed to warn plaintiff of the problems associated with formaldehyde in a temporary housing unit such as a travel trailer. To the contrary, Fleetwood shows the unit complies with all industry standards and practices and that it placed three (3) separate warnings in the owner's manual and posted the same three (3) warnings in the bathroom of the vanity. Fleetwood denies that unit was defective in any respect. Furthermore, Fleetwood denies that gaseous formaldehyde generally – or specifically with respect to Timia – either caused or aggravated her eczema (atopic dermatitis). Fleetwood will show that there is insufficient evidence in the world's medical literature to draw the conclusion that gaseous formaldehyde, especially in the levels likely experienced in the Dubuclet unit, either causes or aggravates atopic dermatitis.

In sum, Fleetwood contends that at all times acted reasonably and that no condition of the trailer caused the medical conditions alleged by Plaintiffs.

7. UNCONTESTED MATERIAL FACTS

- A. Plaintiff, Elisha Dubuclet, and her minor daughter, Timia Dubuclet, are residents of the Parish of Orleans in the State of Louisiana.
- B. FEMA provided Plaintiff, Elisha Dubuclet, and her minor daughter a travel trailer with Vehicle Identification Number (VIN) 4CJ1F322764015272.
- C. This travel trailer was manufactured by Defendant Fleetwood on or about March 27, 2006 for use by FEMA as emergency housing.
- D. Fleetwood sold approximately 10,500 travel trailers to Morgan Buildings & Spas, Inc. for provision to FEMA following hurricanes Katrina and Rita.

- E. Fleetwood sold the travel trailer ultimately provided to the Dubuclets to Morgan Buildings & Spas, Inc. pursuant to a Master Sales Agreement between Fleetwood and Morgan Buildings & Spas, Inc. to manufacture and provide travel trailer(s) to FEMA for use as emergency housing.
- F. The travel trailer was manufactured by Fleetwood at its Longview, Texas plant to be used as emergency housing for displaced residents of hurricanes Katrina and/or Rita.
- G. Certain component parts used by Fleetwood in the manufacture of this travel trailer contained urea formaldehyde and/or urea formaldehyde resins.
- H. The Fleetwood travel trailer was delivered to Plaintiff and her minor daughter, Timia Dubuclet, for occupancy in New Orleans, Louisiana at 6046 Dorothea Street.
- I. Elisha Dubuclet and Timia Dubuclet resided in this Fleetwood unit from June 2006 to approximately September 2007.
- J. Elisha Dubuclet and Timia Dubuclet resided in this Fleetwood travel trailer for approximately 16 months.
- K. FEMA has provided thousands of travel trailers to displaced residents following natural disasters in the United States since at least 1992, including displaced residents from the Gulf Coast region.
- L. FEMA provided approximately 143,000 emergency housing units to families across the Gulf Coast, in response to hurricanes Katrina and Rita.
- M. Fleetwood Travel Trailers of Texas, Inc. transferred the Dubuclet travel trailer to Morgan Buildings and Spas, Inc. on or about March 28, 2006.

- N. Morgan Buildings & Spas, Inc. sold this travel trailer to FEMA for use as emergency housing.
- O. The travel trailer provided to Elisha and Timia Dubuclet was a Fleetwood 32 FSH (handicap) model with a slide out feature.
- P. By May of 2006, the Fleetwood trailer provided to the Dubuclet family was set up at 6046 Dorothea Street in New Orleans.
- Q. On July 8-9, 2009 at the FEMA Storage Facility in Lottie, Louisiana, the Fleetwood trailer, which had been previously occupied by Timia Dubuclet and her family, was tested for formaldehyde by W.D. Scott Group, Inc. for formaldehyde.
- R. This testing on July 8-9, 2009 was witnessed by Tony Watson of Workplace Hygiene on behalf of Fleetwood.
- S. On August 10-14, 2009, at the FEMA Storage Facility at Lottie, Louisiana, the Fleetwood trailer, which had previously been occupied by Timia Dubuclet and her family, was tested for formaldehyde by Tony Watson of Workplace Hygiene, on behalf of Fleetwood. The testing was witnessed by W.D. Scott, on behalf of the Plaintiffs.
- T. During the passive sampling performed W.D. Scott Group, Inc. on July 8-9, 2009, inside the Fleetwood trailer provided to the Dubuclet family, the level of formaldehyde concentration in the air was 0.34 parts per million (ppm) or 340 parts per billion (ppb).
- U. During the passive sampling performed by Tony Watson on August 10, 2009, inside the Fleetwood trailer provided to the Dubuclet family, the level of

formaldehyde concentration in the air was 0.16 ppm or 160 ppb.

- V. During the active sampling performed by W.D. Scott Group, Inc. on July 8, 2009, inside the Fleetwood trailer provided to the Dubuclet family, the level of formaldehyde concentration in the air was 0.23 ppm or 230 ppb.
- W. During the active sampling performed by Mr. Tony Watson on August 13-14, 2009, inside the Fleetwood trailer provided to the Dubuclet family, the level of formaldehyde concentration in the air was 0.22 ppm or 220 ppb.
- X. The weather data collected by Dr. Lee Branscome, Ph.D., a certified meteorologist, attached to his report dated July 9, 2009, is representative of the weather conditions for the time frame involved herein.
- Y. Elisha Dubuclet, and her minor son, Timothy Dubuclet, Jr. are named plaintiffs in this litigation. The Court has determined that Timia Dubuclet's case shall be tried separately from their claims.
- Z. Timia Dubuclet was diagnosed with eczema (atopic dermatitis) at approximately six (6) weeks old.
- AA. According to the National Vital Statistics Report, Timia Dubuclet's life expectancy is 70 additional years (age 81.1).
- BB. According to the National Vital Statistics Report, Timia Dubuclet's worklife equivalent is 40.3 years from the age of 18.

8. CONTESTED ISSUES OF FACT

- A. Whether or not the Fleetwood travel trailer provided to Elisha Dubuclet by FEMA contained levels of formaldehyde which were hazardous to the health and well being of Timia Dubuclet.

- B. Whether or not the Fleetwood travel trailer provided to Elisha Dubuclet by FEMA contained levels of formaldehyde which injured Timia Dubuclet.
- C. Whether or not Plaintiff Elisha Dubuclet was given an Owner's Manual with this travel trailer.
- D. The nature, extent and adequacy of all pertinent warnings allegedly provided to the Plaintiff by Defendant Fleetwood.
- E. Whether or not the Fleetwood trailer occupied by Plaintiff was unreasonably dangerous in its design for its intended or reasonably foreseeable use by Plaintiff.
- F. Whether or not the Fleetwood trailer occupied by Plaintiff was unreasonably dangerous in its construction or composition for its intended or reasonably foreseeable use by Plaintiff.
- G. Whether or not Fleetwood failed to test its travel trailers before putting them into use by victims of hurricanes Katrina and Rita.
- H. Whether or not the Fleetwood travel trailer should have been equipped with a means for the occupants to test for formaldehyde.
- I. Whether or not the Fleetwood's travel trailers should have been equipped with a Formaldehyde Abatement Kit.
- J. Whether or not the Fleetwood trailer was unreasonably dangerous in its intended or reasonably foreseeable use, based on inadequate warnings to Plaintiff.
- K. The amount of damages owed to Plaintiff as a result of the actions of Defendant, Fleetwood regarding:

1. Past, present, and future physical pain and suffering of Timia Dubuclet;
 2. Past, present, and future mental anguish and emotional distress of Timia Dubuclet;
 3. Past, present, and future medical expenses for Timia Dubuclet; and
 4. Loss or impairment of life's pleasures for Timia Dubuclet and other damages which the trier of fact deems appropriate in accordance with the evidence.
- L. The specifications in all contractual agreements between the United States/FEMA and Fleetwood; and the respective parties' knowledge of, and communication with one another about, the risks to Plaintiff arising from any such specifications.
- M. Whether formaldehyde can aggravate eczema; and if so, at what level.
- O. Whether or not there is an increased risk of cancer associated with formaldehyde and at what levels.
- P. Whether Timia Dubuclet's eczema was aggravated by exposure to formaldehyde from the Fleetwood trailer.
- Q. Whether Timia Dubuclet's skin was damaged as a result of formaldehyde from the Fleetwood trailer.
- R. Whether Timia Dubuclet has any current medical conditions as a result of exposure to formaldehyde emitted by the Fleetwood travel trailer while she lived there.
- S. Whether Timia Dubuclet has any permanent medical conditions as a result of

exposure to formaldehyde from the Fleetwood trailer.

- T. Whether formaldehyde can cause permanent damage; and if so, at what level of exposure.
- U. Whether formaldehyde can cause cancer; and if so, what type of cancer and at what level of exposure.
- V. Whether Timia Dubuclet has been exposed to levels of formaldehyde from the Fleetwood trailer sufficient to cause her to have an increased risk of cancer.
- W. Whether exposure to formaldehyde at the levels present in the Dubuclet trailer would cause a person to have a reasonable fear of contracting cancer.
- X. Whether or not composite wood products containing formaldehyde caused formaldehyde offgassing in this travel trailer thereby causing Plaintiff to be exposed to formaldehyde for approximately 16 months.
- Y. Whether the amount, composition and manner of use of composite wood products can cause formaldehyde offgassing in a travel trailer sufficient to cause Plaintiff to be exposed to hazardous levels of formaldehyde.
- Z. What level of formaldehyde is necessary to cause eye, nose and/or throat irritation.
- AA. Whether the trailer used by Timia Dubulcet was damaged prior to, during, or after the initial installation on Dorothea Street in New Orleans, such that the interior air formaldehyde levels were actually increased.
- BB. Whether or not the travel trailer could have been tested for formaldehyde offgassing prior to leaving the Longview, Texas plant.

- CC. Whether or not there exists a device that could have detected levels of formaldehyde once it became occupied.
- DD. Whether or not by reducing the number of windows, the Fleetwood travel trailer, as manufactured by Fleetwood, failed to be properly and adequately ventilated and/or designed.
- EE. Whether or not there existed an unreasonably dangerous level or levels of formaldehyde emissions during the period of Plaintiff's occupancy of the Fleetwood trailer.
- FF. Whether eczema is a condition brought about by an allergic response.
- GG. Whether exposure to gaseous formaldehyde at concentration levels such as were found in the Dubuclet trailer cause an increased risk of any form of cancer.
- HH. Whether formaldehyde in a gaseous state can aggravate atopic dermatitis, and if so, at what level.
- II. Whether Timia Dubuclet is allergic to formaldehyde.
- JJ. Whether Timia Dubuclet has any current medical condition caused by exposure to formaldehyde emitted by the Dubuclet trailer while she lived there.
- KK. Whether Timia Dubuclet's atopic dermatitis was aggravated by exposure to formaldehyde emissions from the Fleetwood trailer.
- LL. Whether or not Fleetwood had a long standing policy of purchasing LFE composite wood products.

9. CONTESTED ISSUES OF LAW:

- A. Whether Defendant, Fleetwood is liable to Plaintiff under the LPLA.
- B. Whether the Defendant's legal fault, if any, was a cause-in-fact and proximate cause of damages sustained and recoverable by Plaintiff, on behalf of her daughter Timia Dubuclet.
- C. Whether Plaintiff Elisha Dubuclet may be assessed with comparative fault.
- D. Whether or not the "government contractor defense" is available to Fleetwood.
- E. Whether the Dubuclet unit was unreasonably dangerous in design and/or construction and whether that design and/or construction caused Timia Dubuclet to suffer damages.
- F. Whether the Dubuclet unit was unreasonably dangerous; whether Fleetwood inadequately warned of that danger; and whether that inadequate warning caused damages to Timia Dubuclet.
- G. The amount of damages, if any, sustained by Timia Dubuclet.
- H. Whether the Dubuclet unit was defective because of a lack of and/or an inadequate warning, and said lack of and/or inadequate warning caused damages to Timia Dubuclet.
- I. Whether specifications provided by the government are reasonably precise as a matter of law when they describe exactly the result desired but do not prevent the contractor from exercising some discretion as to methods of production.
- J. Whether there is a basis for asking the jury to allocate fault to a specific non-

party person or entity, and, in the case of FEMA, whether that fault must rise to the level of gross or willful misconduct for fault to be allocated to FEMA.

- K. Whether a specific non-party person or entity was negligent such that there is a basis for asking the jury to allocate fault to such a specific non-party person or entity.

10. EXHIBITS

Attached hereto as Exhibit A is Plaintiff's Exhibit List. Defendant Fleetwood's Exhibit List is attached as Exhibit B. The parties will consolidate these lists into a joint submission by noon on Tuesday, December 1, 2009 pursuant to Rec. Doc. 7605.

11. DEPOSITIONS

Attached hereto as Exhibit C is the Trial Plan in this regard.

The parties will offer the deposition testimony, or portions thereof, of witnesses identified in the attached witness list as being presented by videotape or transcribed deposition. The parties reserve the right to introduce by deposition the testimony of any witness who is unavailable to testify at trial, though subpoenaed to do so, or when an attempt to subpoena said witness is unsuccessful, or the person resides out of the jurisdiction of this Honorable Court.

12. CHARTS AND GRAPHS

The parties may use charts, graphs, powerpoints, and other demonstrative aids contained in their experts' reports and/or utilized during expert depositions and/or marshalled and/or exchanged prior to trial. The parties have agreed to exchange charts and graphs, and other visual aides to be used at trial at the offices of Lambert & Nelson, PLC on or before Thursday, December 3, 2009, at 9:00 AM, or as otherwise instructed by the

Court.

13. WITNESSES

Attached hereto as Exhibit D is Plaintiff's Witness List. Defendant Fleetwood's Witness List is attached as Exhibit E.

14. JURY TRIAL

The parties have submitted jury questions/instructions, and objections thereto, and will participate in a jury charge conference with the Court as instructed by this Honorable Court.

15. DAMAGES

The issues of liability will not be tried separately from that of quantum.

16. OTHER MATTERS THAT MIGHT EXPEDITE A DISPOSITION OF THE CASE

On Wednesday, November 4, 2009, Liaison Counsel for Plaintiffs, authorized by and on behalf of the Court-Appointed Plaintiffs' Steering Committee, made a settlement proposal with respect to claims asserted against Defendant Fleetwood and its liability insurer(s). Mediation before John Perry, Esq. (appointed by this Honorable Court) is presently scheduled for Wednesday, December 2, 2009.

17. TRIAL

Trial shall commence on Monday, December 7, 2009, at 8:30 a.m. and will require approximately ten days of trial to complete.

18. STATEMENT OF COMPLIANCE-I

This Pre-Trial Order has been formulated after conference at which counsel for the respective parties have appeared in person. Reasonable opportunity has been afforded counsel for corrections, or additions, prior to signing. Hereafter, this order will control the

course of the trial and may not be amended except by consent of the parties and the Court, or by order of the Court to prevent manifest injustice.

19. STATEMENT OF COMPLIANCE-II

Counsel acknowledge that cell phones, pagers, beepers, and any other electronic communication devices are not allowed in the courtroom, and shall abide by this rule. Counsel shall further notify all clients and his/her witnesses of this rule. Only counsel for the parties are allowed to have computers in the courtroom.

20. SETTLEMENT

See statement with regard to settlement in Paragraph 16 of this Pre-Trial Order.

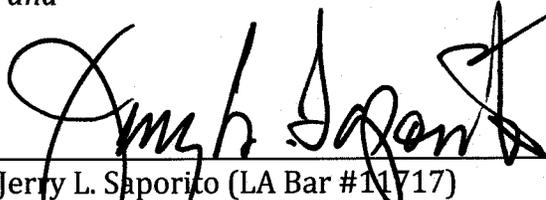
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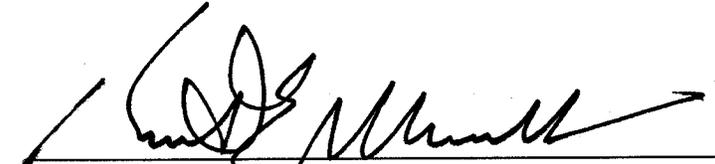
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New Orleans, Louisiana, this 30th day of November, 2009.


HONORABLE KURT D. ENGELHARDT
UNITED STATES DISTRICT JUDGE

*PROTRAC ORDER
MDL 1873*

EXHIBIT A TO THE JOINT PRE-TRIAL ORDER

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

<p>IN RE: FEMA TRAILER FORMALDEHYDE PRODUCTS LIABILITY LITIGATION</p> <p>RELATES TO CIVIL ACTION NO. 07-9228 Aldridge, et al. vs. Gulf Stream Coach, Inc., et al. (Elisha Dubuclet obo Timia Dubuclet vs. Fleetwood, Fluor Enterprises, Inc., and FEMA)</p>	<p>* * * * * * *</p>	<p>MDL NO. 1873</p> <p>SECTION "N" (5)</p> <p>JUDGE ENGELHARDT</p> <p>MAGISTRATE CHASEZ</p>
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PLAINTIFF'S SUPPLEMENTAL EXHIBIT LIST

NOW INTO COURT, through undersigned counsel, come Plaintiff, Elisha Dubuclet on behalf of her minor child, Timia Dubuclet, pursuant to this Honorable Court's Trial Scheduling Order dated August 17, 2009 (Doc. No. 2717), who hereby submit the following Exhibit List in connection with the above captioned matter:

EXHIBIT ID	Category:	EXHIBIT DESCRIPTION	BATES RANGE	STATUS
Plaintiffs' Exhibits				
	Governmental Agency Reports and Studies			
1		CDC Summary and Interim Report: VOC and Aldehyde Emissions in Four FEMA Temporary Housing Units - Indoor Environment Department, Lawrence Berkeley National Laboratory, 8 May, 2008	PSC002113 - PSC002166	

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"	PSC002167 - PSC002181	
3		CDC Interim Findings on Formaldehyde Levels in FEMA-Supplied Travel Trailers, Park Models, and Mobile Homes - February 29, 2008	PSC002182- PSC002202	
4		CDC Final Report on Formaldehyde Levels in FEMA-Supplied Travel Trailers, Park Models, and Mobile Homes - July 2, 2008	PSC002203 - PSC002263	
5		Agency for Toxic Substances and Disease Registry (ATSDR) "Health Consultation, Formaldehyde Sampling at FEMA Temporary Housing Units, Baton Rouge, Louisiana, February 1, 2007"	PSC002264 - PSC002277	
6		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"	PSC002278 - PSC002318	
7		Statement of Harvey E. Johnson, Jr., Acting Deputy Administrator and Chief Operating Officer for FEMA before the U.S. Senate Subcommittee on Disaster Recovery and Subcommittee on State, Local, and Private Sector Preparedness and Integration, March 4, 2008	PSC003188 - PSC003198	

8		Statement of R. David Paulison, FEMA Administrator, before the U.S. House of Representatives Committee on Oversight and Government Reform, July 19, 2007	PSC003199 - PSC003207	
9		"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	PSC003208 - PSC003213	
10		U.S. EPA "Indoor Air Quality" Basic Information for Formaldehyde - Last updated November 14, 2007	PSC003214 - PSC003217	
11		"Formaldehyde Levels in FEMA-Supplied Trailers - Early Findings from the Centers for Disease Control and Prevention"	PSC003218 - PSC003219	
12		ASTM Standard Test Method for Determining Formaldehyde Concentrations in Air and Emission Rates in Wood Products Using a Large Chamber (2002)	PSC021571 - PSC021582	
13		Indoor Air Quality and Health in FEMA Temporary Housing for Trailer Residents prepared by CDC	PSC021583 - PSC021584	
14		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	PSC024251 - PSC024277	
15		ASHRAE Handbook, 2007: HVAC Applications, Chapter One: Residences	DUB002101 - DUB002107	

16		Department of Homeland Security, Office of Inspector General: FEMA's Response to Formaldehyde in Trailers dated June, 2009	PSC025938 – PSC026022	
17		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"	PSC002070 - PSC002112	
	Standards, Regulations and Statutes			
18		24 C.F.R. § 3280.309, Health Notice on formaldehyde emissions Current through November 6, 2008	PSC003147	
19		§3280.309 – 24 CFR Ch. XX, Health Notice on Formaldehyde emissions (4-1-07 Edition)	PSC021693 – PSC021694	
20		ATSDR Formaldehyde Minimal Risk Levels and Worksheets – Appendix A	PSC003158 - PSC003172	
21		U.S. Department of Housing and Urban Development Rules and Regulations regarding Formaldehyde, 49 FR 31996	PSC003173 - PSC003186	
22		California Air Resources Board's (CARB) Standards	PSC021695 – PSC021753	
23		Occupational Safety and Health Administration's (OSHA) Standards for Formaldehyde	PSC021754 – PSC021772	

24		American Conference of Governmental Industrial Hygienists' (ACGIH) Standards for Formaldehyde		
25		National Institute of Occupational Safety and Health's (NIOSH) Standards for Formaldehyde	PSC024278 - PSC024358	
26		World Health Organization (WHO) and Health Canada's Standards for Formaldehyde	PSC024359 - PSC024361	
27		World Health Organization (WHO) and Health Europe's Standards for Formaldehyde	PSC024830 - PSC025117	
28		American National Standard (ANSI) for Medium Density Fiberboard dated February 4, 1994	PSC021773 - PSC021784	
29		American National Standard (ANSI) for Particleboard dated February 8, 1999	PSC021785 - PSC021797	
30		ANSI A119.2, NFPA 1192: Standard on Recreational Vehicles; 2002 Edition	DUB002054 - DUB002100	
31		ANSI A119.4, NFPA 1194: Standard on Recreational Vehicle Parks and Campgrounds; 2002 Edition	PSC021798 - PSC021817	
32		Toxicological Profile on Formaldehyde prepared by ATSDR on July 1999	PSC024362 - PSC024829	
	Articles			
33		July 20, 2007 "Formaldehyde and FEMA Trailers" by Lee Shull, Ph.D	PSC021640 - PSC021641	

34		Maddalena, Randy; Russell, Marion; Sullivan, Douglas P.; an Apte, Michael G. "Aldehyde and Other Volatile Organic Chemical Emissions in Four FEMA Temporary Housing Unites - Final Report" - Ernest Orlando Lawrence Berkeley National Laboratory, November 2008	PSC025133 - PSC025193	
35		"Effect of Formaldehyde Inhalation on Hsp70 in Seminiferous Tubules of rat testes: an immunohistochemical study" by O. Ozen, et al. (2005)	PSC021823 - PSC021829	
36		"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.	PSC021830 - PSC021846	
37		"Effects of inhaled Formaldehyde on Learning and Memory of Mice" by Z. Lu, et al. (2008)	PSC021847 - PSC021854	
38		"Low Concentrations of Formaldehyde induce DNA damage and delay DNA repair after UV Irradiation in Human Skin Cells" by G. Emri, et al. (2004)	PSC021855 - PSC021866	
39		National Cancer Institute (NCI): Fact Sheet: Formaldehyde and Cancer Risk dated May 7, 2009	PSC021867 - PSC021873	
40		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	PSC026117 - PSC026118	

41		FEMA media release: FEMA Awards Contracts for Low Emissions Travel Trailers - April 7, 2009 - Release No. HQ-09-034b	PSC021876 - PSC021879	
42		FEMA media release: FEMA to Introduce New Type of Manufactured Home - Dec. 18, 2008 - Release No. 1791-343	PSC021880	
43		Article - "Formaldehyde Exposure in Nonoccupational Environments" by K. Dally, et al.	PSC021881 - PSC021888	
44		Article - "Formaldehyde-related Health Complaints of Residents Living in Mobile and Conventional Homes" by I. Ritchie, et al.	PSC021889 - PSC021894	
45		Article - FEMA rolls out new disaster mobile homes: Formaldehyde levels are far below those of Hurricane Katrina, Rita trailers dated 05/14/09	PSC021895 - PSC021896	
46		Fact Sheet: Airborne Toxic Control Measure (ATCM) to Reduce Formaldehyde Emissions from Composite Wood Products	PSC026119 - PSC026120	
47		Environmental Health - Formaldehyde Exposure in Homes: A Reference for State Officials to Use in Decision-Making (March 2008)	PSC021897 - PSC021902	
48		Environmental Health - What you should know about Formaldehyde in Mobile Homes	PSC021903 - PSC021906	
49		Formaldehyde Levels in FEMA-Supplied Trailers; Early Findings from the Centers for Disease Control and Prevention	PSC003218 - PSC003219	

50		"Formaldehyde Indoors" by Dr. Stephen Smulski, April 1987, Progressive Builder, 12(4):9-11.	PSC002752 - PSC002754	
51		Boyson, M. "Nasal mucosa in workers exposed to formaldehyde: a pilot study." Br J of Ind Med 47:116-121, 1990.	PSC002845 - PSC002853	
52		Edling, C. "Occupational exposure to formaldehyde and histopathological changes in nasal mucosa." Br J of Ind Med 45:761-765, 1988.	PSC002854 - PSC002865	
53		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.	PSC002866 - PSC002881	
54		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.	PSC002882 - PSC002893	
55		Garrett, MH. "Increased risk of allergy in children due to formaldehyde exposure in homes." Allergy 1999;54(4):330-7.	PSC002898 - PSC002905	
56		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.	PSC002906 - PSC002908	
57		Platts-Mills, TA. "Indoor allergens and asthma: Report of the Third International Workshop." J Allergy Clin Immunol 1997;100(6 Pt 1):S2-S24.	PSC002909 - PSC002931	

58		"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	PSC006033 – PSC006052	
59		"Children from FEMA trailer park battle serious health problems" USA Today 11/24/08	PSC006053 – PSC006054	
60		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	PSC006055 – PSC006059	
61		Krzyzanowski, Michal, "Chronic Respiratory Effects of Indoor Formaldehyde Exposure" Environmental Research 52, 117-125 (1990)	PSC006060 – PSC006068	
62		"Indoor Residential Chemical Emissions as Risk Factor for Children's Respiratory Health" by M. Mendell	PSC022228 – PSC022267	
63		"Formaldehyde and Leukemia: Epidemiology, Potential Mechanisms, and Implications for Risk Assessment" by Zhang, et al.	PSC026121 – PSC026131	
64		"Formaldehyde-releasers: relationship to formaldehyde contact allergy. Contact allergy to formaldehyde and inventory of formaldehyde-releasers" by Groot, et al.	PSC026132 – PSC026154	

65		"Prospective study of clinical symptoms and skin test reactions in medical students exposed to formaldehyde gas" by Takahashi, et al. (Exhibit 20 from the deposition of Dr. Robert James)	JAMES-008350 - JAMES-008356	
66		"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. (Exhibit 21 from the deposition of Dr. Robert James)	JAMES-008357 - JAMES-008359	
67		"Ambient Formaldehyde Levels and Allergic Disorders Among Japanese Pregnant Women: Baseline Data From the Osaka Maternal and Child Health Study" by Matsunaga, et al. (Exhibit 22 from the deposition of Dr. Robert James)	JAMES-008360 - JAMES-008366	
	Expert Records and Files			
68		Affidavit of Lee E. Branscome, Ph.D., C.C.M.	DUB000254 - DUB000271	
69		Curriculum Vitae of Lee E. Branscome, Ph.D., C.C.M.	PSC025205 - PSC025214	
70		Weather data from Dr. Lee Branscome for New Orleans, Louisiana and Lottie, Louisiana	DUB000272 - DUB000273	
71		Affidavit of Mary C. DeVany, M.S., C.S.P., C.H.M.M.	DUB000603 - DUB000644	
72		Curriculum Vitae of Mary C. DeVany, M.S., C.S.P., C.H.M.M.	PSC025215 - PSC025218	

73		THU Testing Protocol prepared by Mary DeVany, et al.	PSC003220 – PSC003348	
74		Medical Records of Timia Dubuclet and file of George Farber, M.D.	DUB-FARBER- 000001 – DUB-FARBER- 000509	
75		Affidavit of Paul Hewett, Ph.D. dated July 16, 2009	DUB000544 – DUB000566	
76		Second Affidavit of Paul Hewett, Ph.D. dated October 26, 2009	DUB002145 – DUB002174	
77		Addendum to Affidavits of Paul Hewett, Ph.D. dated November 4, 2009	DUB002175 – DUB002187	
78		Curriculum Vitae of Paul Hewett, Ph.D.	PSC025265 – PSC025268	
79		File of Paul Hewett, Ph.D.	DUB-HEWETT- 000001 – DUB-HEWETT- 001055	
80		Affidavit of Marco Kaltofen, P.E. (Civil)	DUB000567 – DUB000587	
81		Curriculum Vitae of Marco Kaltofen, P.E. (Civil)	PSC025270 – PSC025278	
82		File of Marco Kaltofen, P.E. (Civil)	DUB-KALTOFEN- 000001 – DUB-KALTOFEN- 003362	
83		Affidavit of Kenneth Laughery, Ph.D.	DUB000588 – DUB000595	
84		Curriculum Vitae of Kenneth Laughery, Ph.D.	PSC025282 – PSC025310	
85		File of Kenneth Laughery, Ph.D.	DUB-LAUGH- 000001 – DUB-LAUGH- 000654	

86		Affidavit of Alexis Mallet, Jr.	DUB000683 - DUB001120	
87		Curriculum Vitae of Alexis Mallet, Jr.	PSC025314 - PSC025321	
88		File of Alexis Mallet, Jr. including thermographs and photographs	DUB-MALLET-000001 - DUB-MALLET-002515	
89		Trailer drawings by Alexis Mallet, Jr.	DUB001110 - DUB001120	
90		Affidavit of Lawrence G. Miller, M.D., M.P.H.	DUB000596 - DUB000602	
91		Curriculum Vitae of Lawrence G. Miller, M.D., M.P.H.	PSC025327 - PSC025342	
92		File of Lawrence G. Miller, M.D., M.P.H.	DUB-MILLER-000001 - DUB-MILLER-001221	
93		Affidavit of Charles David Moore, P.E., P.L.S.	DUB001121 - DUB001128	
94		Curriculum Vitae of Charles David Moore, P.E., P.L.S.	PSC025346 - PSC025348	
95		File of Charles David Moore, P.E., P.L.S.	DUB-MOORE-000001 - DUB-MOORE-000590	
96		Affidavit of Ervin Ritter, P.E.	DUB001395 - DUB002133	
97		Curriculum Vitae of Ervin Ritter, P.E.	PSC025350 - PSC025352	
98		File of Ervin Ritter, P.E.	DUB-RITTER-000001 - DUB-RITTER-001817	
99		Affidavit of William D. Scott, P.E., C.H.M.M.	DUB000645 - DUB000682	

100		Curriculum Vitae of William D. Scott, P.E., C.H.M.M.	PSC025355 – PSC025359	
101		File of William D. Scott, P.E., C.H.M.M.	DUB-SCOTT-000001 – DUB-SCOTT-005566	
102		W.D. Scott Group, Inc. Formaldehyde Passive Monitoring Data: FEMA Housing Units (Test Results on July 8, 2009 and July 9, 2009)	DUB000664 – DUB000665; DUB000668	
103		W.D. Scott Group, Inc. Formaldehyde Active Sampling Data: FEMA Housing Units (Test Results on July 8, 2009)	DUB000662 – DUB000663; DUB000667	
104		Affidavit of Edward H. Shwery, Ph.D. regarding Timia Dubuclet	DUB001129 – DUB001137	
105		Second Affidavit of Edward H. Shwery, Ph.D. regarding Timia Dubuclet	DUB002135 – DUB002144	
106		Curriculum Vitae of Edward H. Shwery, Ph.D.	PSC025369 – PSC025384	
107		File of Edward H. Shwery, Ph.D.	DUB-SHWERY-000001 – DUB-SHWERY-000377	
108		Affidavit of Stephen Smulski, Ph.D.	DUB000274 – DUB00284	
109		Curriculum Vitae of Stephen Smulski, Ph.D.	PSC025392 – PSC025403	
110		File of Stephen Smulski, Ph.D.	DUB-SMULSKI-000001 – DUB-SMULSKI-000653	
111		Affidavit of Patricia M. Williams, Ph.D., D.A.B.T.	DUB000206 – DUB000253	

112		Curriculum Vitae of Patricia M. Williams, Ph.D., D.A.B.T.	PSC025407 – PSC025437	
113		File of Patricia M. Williams, Ph.D., D.A.B.T.	DUB-WILL-002461 – DUB-WILL-003337	
114		Exhibits from the deposition of Michael Zeiman	Zeiman Exhibits 1 – 2	
115		Exhibits from the deposition of Elden Smith	Smith Exhibit 1	
116		Exhibits from the deposition of Danny McBride	McBride Exhibits 1 – 15 and Exhibits 18 - 19	
117		Exhibits from the deposition of William Farish	Farish Exhibits 1 - 2	
118		Exhibits from the deposition of Jessica Guay	Guay Exhibits 1 - 2	
119		Exhibits from the deposition of Rene Rodriguez	Rodriguez Exhibits 1 - 2	
	Testing Database			
120		Formaldehyde Testing Database prepared by the PSC (as of August 5, 2009)	PSC026037	
	Inspection in Lottie, LA			
121		Photographs taken by D. Scott Johnson, Bombet, Cashio & Associates, during the inspection on July 8, 2009 and July 9, 2009 at FEMA Staging/Storage Facility in Lottie, Louisiana	DUB000287 – DUB000543	
122		Video taken by D. Scott Johnson, Bomber, Cashio & Associates, during the inspection on July 8, 2009 and July 9, 2009 at FEMA Staging/Storage Facility in Lottie, Louisiana	DUB000285 – DUB000286	

123		Photographs taken by Hugh Lambert, Esq., Lambert & Nelson, PLC, during the inspection on July 8, 2009 at FEMA Staging/Storage Facility in Lottie, Louisiana	DUB000116 - DUB000205	
124		Photographs taken by William D. Scott, W.D. Scott Group, Inc., during initial window/door inspection on July 2, 2009 at FEMA Staging/Storage Facility in Lottie, Louisiana	DUB000002 - DUB000115	
125		Photographs of Inspection taken by Robert Wozniak and Tony Watson	FLE00013954 - FLE00014082; FLE00015180	
126		Video taken by William D. Scott, W.D. Scott Group, Inc., during initial window/door inspection on July 2, 2009 at FEMA Staging/Storage Facility in Lottie, Louisiana	DUB000001	
127		Animations created by C4 Animation (Reagan Johnson)		
128		Test results of testing performed Tony Watson, on behalf of Defendant, Fleetwood, on the Dubuclet travel trailer		
129		Results of all testing and inspection of the Fleetwood/Dubuclet unit including, but not limited to, air sampling, temperature, humidity, and photographs thereof		
130		Exemplar of a Personal Monitoring System for Aldehydes (Exemplar Passive Dosimeter)		
131		Exemplar of a Panel of Wall from Fleetwood Travel Trailer		

	Fleetwood			
132		Fleetwood: Pioneer Owner's Manual dated 2006	FLE-00006495 - FLE-00006615	
133		Fleetwood: Pioneer Owner's Manual dated 2006 (excerpts regarding Jacking Issues)	FLEET30b6- 000001, 000005, 000007, 000008, 000011, 000034, 000035, 000036, 000037, 000038, 000039, 000040, 000098	
134		Fleetwood Enterprises, Inc. Travel Trailer Owner's Manual Excerpts	PSC003122 - PSC003134	
135		Confidential Consolidated Production: Unit Information	FLE-00010739 - FLE-00010747	
136		Fleetwood Floor Plan: FEMA 32FSH dated 12-07-2004	FLE-00004089 - FLE-00004090	
137		Fleetwood Enterprises, Inc.'s Bill of Materials and Floor Plans (FEMA/JDE package)	FLE-00004474 - FLE-00004835	
138		Memorandum from Mike Livreri to Distribution regarding 32FSH, Product Code 428 (Special FEMA Handicap Unit) dated 09-07-2005	FLE-00005018 - FLE-00005020	
139		Fleetwood Enterprises, Inc., Master Sales Agreement and Purchase Orders	FLE-00000045 - FLE-00000050	
140		Amendment No. 1 to Fleetwood Enterprises, Inc.'s Master Sales Agreement	FLE-00005671	
141		Amendment No. 2 to Fleetwood Enterprises, Inc.'s Master Sales Agreement	FLE-00005669 - FLE-00005670	
142		Important Health Notice regarding Formaldehyde	FLE-00005672	

143		Exhibit 7: Travel Trailer Installation	FL-FCA-000113 - FL-FCA-000122	
144		RADCO Documents Fact Finding Reports: Formaldehyde Evaluation prepared for Fleetwood Enterprises, Inc.	FLE-00006624 - FLE00006897	
145		Fleetwood: RV Ownercare Manual; Ownercare Warranty System (Partner Guidelines) edition publication date: April 2005	FLE-00009792 - FLE-00009826	
146		Photographs of Fleetwood Plant 40		
147		Travel Trailer Assembly Manual from Robert Wozniak's Reliance Materials	FLE00010017 - FLE00010912	
148		Bill of Materials from Robert Wozniak's Reliance Materials	FLE00004474 - FLE00004835	
149		Warning Label from Robert Wozniak's Reliance Materials	FLE00012455	
150		Email from Bill Farish regarding protecting particleboard dated October 11, 2005	FLE-00000797 - FLE-00000801	
151		Fleetwood Formaldehyde Abatement Kit		
152		Quality Control Remarks and Equipment Serial Number Information	FLE_00010747a - FLE_00010747b	
153		Email correspondence from Bill Farish to Dick Reinhard on September 26, 2005 regarding the number of units (3,000) that must be delivered by the end of November 2005	FLE00000621	

154		Email correspondence from Bill Farish to Dick Reinhard on September 23, 2005 regarding Interpretation of FEMA specifications, DAIPIA drawings and inspection of units	FLE00000622	
155		Email correspondence from Doug Henriquez on September 23, 2005 regarding Production within limitations given (raw material issues)	FLE00000623 – FLE00000624	
156		Email correspondence from Ted Gugliotta on October 25, 2005 regarding weight of units and tire blow out issues	FLE00000733 – FLE00000744	
157		Workplace Hygiene: Formaldehyde Air Sampling Protocol created for Fleetwood Enterprises, Inc. by Tony Watson		
	Fluor Enterprises, Inc.			
158		Fluor: FEMA Projects "Specifications"	FL-FCA-003786 – FL-FCA-003803	
159		"Formaldehyde – Process for airing out trailers"	FL-FCA-028200 – FL-FCA-028202	
160		"Action – Contracting Officer Technical Representative (COTR) informs that no further action need be taken"	FL-FCA-007248 – FL-FCA-007300	
161		Work Orders and Documents concerning the Installation of the Dubuclet Unit	FEI000001 – FEI000019	
	FEMA			
162		FEMA Storage Site Duties/Responsibilities regarding Fleetwood and Morgan	FLE-00001943 – FLE-00001945	

163		FEMA Unit Specifications: 32F/32FD and 32FSH/32DFSH dated 11-17-2005	FLE-00006491 - FLE-00006494	
164		FEMA Floor plan regarding FEMA 32F	FLE-00006901 - FLE-00006902	
165		FEMA Model Travel Trailer Procurement Specifications dated 08-12-2004 (HSFE04-04-Q-800)	FLE-00006914 - FLE-00006917	
166		FEMA Accessible Model Travel Trailer Procurement Specifications dated 04-21-2006 (with Accessible One Bedroom Travel Trailer Floor plan)	FLE-00007041 - FLE-00007049	
167		"Important Information for Travel Trailer Occupants" FEMA brochure	PSC002350 - PSC002351	
168		FEMA Model Travel Trailer Procurement Specifications Dated: July 14, 2005	PSC003049 - PSC003057	
169		Declaration of Kevin Souza, former Acting Deputy Director of Individual Assistance Division of FEMA	PSC003058 - PSC003065	
170		"FEMA Storage Site Duties/Responsibilities"	PSC003092 - PSC003094	
171		April 25, 2008 letter from FEMA to a THU occupant	PSC003397 - PSC003399	
172		Summary of Test Results conducted by Weston Solutions, Inc. for the U.S. EPA	PSC003407 - PSC003409	
173		Air Toxics Ltd. Laboratory Narrative for samples submitted by Weston Solutions	PSC003410 - PSC003415	

174		FEMA test results for formaldehyde testing at FEMA THU staging areas during November 2005, December 2005 and January 2006	PSC003416 - PSC003420	
175		FEMA Memorandum from May 31, 2006 regarding Formaldehyde Air Sampling at the THU staging area in Purvis, Mississippi	PSC003421 - PSC003438	
176		Email correspondence between FEMA and Government staff	PSC003439 - PSC003447	
177		FEMA Job Hazard Analysis Worksheet	PSC023600	
178		FEMA Model Travel Trailer Procurement Specifications dated August 12, 2004	FOREST- 0002503 - FOREST-0002508	
179		New FEMA Procurement Specifications dated April 11, 2008 Release Number HQ-08-056	PSC023601 - PSC023686	
180		FEMA Formaldehyde Timeline as of June 15, 2007	PSC023687 - PSC023689	
181		FEMA Timeline as of August 7, 2008 (From the deposition of Kevin Souza, FEMA Representative)	PSC023690 - PSC023702	
182		Dept of Homeland Security - Office of Inspector General - Hurricane Katrina Temporary Housing Technical Assistance Contracts - August 20, 2008 (Internal Audit: OIG-08-88)	PSC023835 - PSC023863	
183		FEMA media release: Initial Indoor Air Quality Tests Results - November 14, 2008	PSC023789 - PSC023790	
184		FEMA media release: FAQ National Disaster Housing Strategy - January 16, 2009	PSC023791 - PSC023794	

185		FEMA Statement on Travel Trailers and Formaldehyde	PSC023795	
186		Email from Christopher DeRosa to Howard Frumkin on February 27, 2007	PSC023796	
187		Correspondence from Christopher DeRosa to Patrick Preston on February 27, 2007	PSC023797	
188		Email from Christopher DeRosa to Howard Frumkin and Thomas Sinks on March 9, 2007	PSC023798 – PSC023799	
189		Email from Christopher DeRosa to Mike Groutt on August 10, 2007	PSC023800	
190		Comments on Chronology of FEMA Trailers, drafter by Christopher DeRosa	PSC023801	
191		Correspondence from Christopher DeRosa to Howard Frumkin on September 21, 2007	PSC023802 – PSC023808	
192		Email from Thomas Sinks to All CDC on October 12, 2007	PSC023809	
193		NCEH/ATSDR Procedures regarding Official Interaction with Persons or Organization outside of NCEH/ATSDR	PSC023810 – PSC023811	
194		Logbook of Joseph Little		
195		Email between Sam Coleman, Joseph Little and Scott Wright on December 1, 2006	PSC023819 – PSC023821	
196		FEMA: Interim Direction on use of Temporary Housing Units (Revision Effective Date: March 10, 2008)	PSC023828 – PSC023834	

197		"FEMA: Important Formaldehyde Information for FEMA Housing Occupants"	FEMA09-000388	
198		"FEMA Travel Trailer Requirements"	PSC021671	
199		Any and all documents produced by Dr. Christopher DeRosa at his deposition, which will be taken on or about July 6, 2009, or used as exhibits thereto		
200		Assessment of Health Complaints among Pediatric Residents of FEMA-Supplied Trailers and Mobile Homes in Hancock County, Mississippi (Exhibit 17 from the deposition of Michael Lapinski, which was taken on July 24, 2009)	Lapinski Exhibit 17	
201		Fact Sheet: Assessment of Health Complaints Among Children Living in FEMA Temporary Housing Units in Hancock County, Mississippi (Exhibit 16 from the deposition of Michael Lapinski, which was taken on July 24, 2009)	Lapinski Exhibit 16	
202		Email from Jessica Guay regarding Harmful Chemicals Notice dated July 17, 2006	FEMA17-005860 - FEMA17-005862	
	Morgan Buildings & Spas, Inc.			
203		Solicitation/Contract/Order for Commercial Items between FEMA and Morgan Buildings & Spas, Inc. dated September 9, 2005 (Exhibit 2 from the deposition of Morgan Buildings & Spas, Inc. through James Schilligo on October 22, 2009)	MORGAN-000002 - MORGAN- 000014	

204		Solicitation/Contract/Order for Commercial Items between FEMA and Morgan Buildings & Spas, Inc., no effective date (Exhibit 3 from the deposition of Morgan Buildings & Spas, Inc. through James Schilligo on October 22, 2009)	MORGAN-000015 – MORGAN-000016	
205		Solicitation/Contract/Order for Commercial Items between FEMA and Morgan Buildings & Spas, Inc., effective date September 1, 2005 (Exhibit 4 from the deposition of Morgan Buildings & Spas, Inc. through James Schilligo on October 22, 2009)	MORGAN-000017	
206		Certificate of Origin for a Vehicle for Vin Number 4CJ1F322764015272 dated March 28, 2006 (Exhibit 9 from the deposition of Morgan Buildings & Spas, Inc. through James Schilligo on October 22, 2009)	MORGAN-001049 – MORGAN-001050	
207		Invoice from Morgan Buildings & Spas, Inc. to FEMA regarding the shipment of the Fleetwood Travel Trailer Vin Number	MORGAN-001051	
	Dubuclet Unit			
208		Photographs taken by the Dubuclet Family of the Fleetwood unit	DUB002188 – DUB002195	
209		Photograph of the “Manufacturer Certifies Compliance with FEMA Specifications” Sticker located on the Fleetwood unit provided to the Dubuclet Family		
210		Any and all labels or stickers on the Fleetwood unit provided to the Dubuclet Family		

	Dubuclet File		
211		Denial Letter from FEMA regarding Timia Dubuclet dated 03-25-2009	PSC026155 – PSC026160
212		Photographs of Elisha Dubuclet, Timia Dubuclet, and Timothy Dubuclet, Jr. regarding skin conditions	DUB002196 – DUB002206
213		Dubuclet/Fleetwood Unit File from Robert Wozniak's Reliance Materials	FLE00010739 – FLE00010747
	Education Records		
214		Education Records from Lake Forest Elementary Charter regarding Timia Dubuclet	DUB002207 – DUB002210
	Medical Records		
215		Medical Records from Children Hospital regarding Timia Dubuclet	DUB001172 – DUB001329
216		Medical Records from Dr. Sam Solis, Napoleon Pediatrics, regarding Timia Dubuclet	DUB001332 – DUB001386
217		Medical Records from Dr. Linda Doughty White regarding Timia Dubuclet	DUB001387 – DUB001392
218		Medical Records from Dr. George Farber, Kenner Dermatology, regarding Timia Dubuclet	DUB001147 – DUB001171
219		Medical Records from Primary Eye Center regarding Timia Dubuclet	DUB001393 – DUB001394
220		Medical Records from Dr. Cesar Parra regarding Timia Dubuclet	DUB002211 – DUB002220
221		Pharmacy Records from John Bull Pharmacy regarding Timia Dubuclet	DUB001330 – DUB001331

	Others			
222		Pamphlet on Eczema/Atopic Dermatitis from the American Academy of Dermatology (AAD)	PSC026161 – PSC026165	
223		Temporary Medical License for Dr. Lawrence Miller	PSC026166	
224		Louisiana State Board of Medical Examiners Temporary Permit Qualifications/Instructions	PSC026167 – PSC026172	
225		BlueLinX Corporation: Material Safety Data Sheet for Urea Formaldehyde Bonded Wood Products	PSC003068 – PSC003078	
226		Georgia-Pacific: Material Safety Data Sheet for Urea Formaldehyde Bonded Wood Products	PSC003079 – PSC003091	
227		Louisiana Pacific: Material Safety Data Sheet for Urea Formaldehyde Bonded Panel Products	FLE00006354	
228		Owens Corning: Material Safety Data Sheet for Low Density Fiber Glass Insulation (Sections 6 and 7)	FLE00006357	
229		Owens Corning: Material Safety Data Sheet for Low Density Fiber Glass Insulation	FLE00006360	
230		Engineering Services and Standards Bulletins from Robert Wozniak's Reliance Materials	FLE00010919 – FLE00010935; FLE00010913 – FLE00010918; FLE00010936	
231		Quality Assurance Manual from Robert Wozniak's Reliance Materials (Exhibit 3 from the deposition of Robert Wozniak, which was taken on October 6, 2009)	Wozniak Exhibit 3	

232		Exemplar parts from a FW travel trailer including, but not limited to, a sample of the interior and exterior trailer wall with internal insulation		
233		Forensic Economics Corporation Report regarding the Life Expectancy and Worklife Equivalent of Timia Dubuclet	PSC026173 – PSC026174	
234		Georgia Pacific: Material Safety Data Sheet #30 for UF Bonded Wood Products	GAPAC-000001– GAPAC-000006	
235		Georgia Pacific: Material Safety Data Sheet #31 for Wood and Wood Products	GAPAC-000007– GAPAC-000011	
236		Manufactured Home Decking Labels from Georgia Pacific	GAPAC-000012– GAPAC-000014	
237		Dr. James Wedner's Employment contract with Washington University in St. Louis, School of Medicine		
238		Dr. James Wedner's Billings to the Formaldehyde Council for the period 2005-2009		
239		Dr. James Wedner's Billings to Fleetwood or any other manufacturing defendants for the period 2005-2009		
240		Dr. James Wedner's Time sheets for time spent on Alexander and Dubuclet matters		
241		Any documents, letters or correspondence that Dr. James Wedner sent to the Center for Disease Control, the ATSDR, or any other governmental or quasi governmental agencies pertaining to Formaldehyde		
242		Any studies that Dr. James Wedner forwarded or furnished to the CDC,		

		ATSDR, or any other governmental or agencies that support your views on the health impact of formaldehyde		
243		Any documents produced by Formaldehyde Counsel and/or Dr. Philip Cole and/or Dr. Mandell with regard to Formaldehyde		
244		Fujii - Effect of Formaldeyde Gas Exposure in a Murine Allergic Hypersensitivity Model	DUB-WILL-003338 - DUB-WILL-003351	
245		Takahashi - Prospective Study of clinical symptoms and skin test rash reactions in medical students exposed to formaldehyde gas	DUB-WILL-003352 - DUB-WILL-003359	

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 reserve the right to supplement and amend this list once discovery is complete.

Respectfully submitted:

**FORMALDEHYDE TRAILER FORMALDEHYDE
PRODUCT LIABILITY LITIGATION**

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MATT MORELAND, #24567

LINDA NELSON, #9938

MIKAL WATTS, Texas # 20981820

DENNIS REICH, Texas # 16739600

ROBERT BECNEL, #14072

CERTIFICATE OF SERVICE

I hereby certify that on _____, 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 electronically mailed the foregoing document to all counsel of record who are non-CM/ECF participants.

/s/ Justin I. Woods

JUSTIN I. WOODS (LA Bar #24713)

**EXHIBIT B-1
TO THE JOINT PRETRIAL**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
NEW ORLEANS DIVISION

IN RE:	FEMA TRAILER	*	MDL NO. 1873
	FORMALDEHYDE	*	
	PRODUCTS LIABILITY	*	
	LITIGATION	*	SECTION: N(5)
		*	
This Document Relates to:		*	
<i>Dubuclet v. Fleetwood Enterprises, Inc.</i>		*	
		*	JUDGE: ENGELHARDT
<i>Case No. 07-9228</i>		*	
		*	
		*	MAG: CHASEZ

**DEFENDANT FLEETWOOD ENTERPRISES, INC. REVISED
TRIAL EXHIBIT LIST**

No.	Exhibit Description	Bates Range
1.	Medical Records related to Timia Dubulcet of Dr. John Willis II	These records have been requested but not yet received.
2.	Medical Records related to Timia Dubuclet of Dr. Linda Ann Doughty White	Dubuclet-Doughty-White-001 through Dubuclet-Doughty-White -009
3.	Medical Records related to Timia Dubuclet of Napoleon Pediatrics produced by Plaintiff	DUB-FARBER-000239 through DUB-FARBER-000293
4.	Medical Records related to Timia Dubuclet of Kenner Dermatology produced by Plaintiff	DUB-FARBER-000340 through DUB-FARBER-000364
5.	Medical Records related to Timia Dubuclet of Medical Center of Louisiana at New Orleans	Withdrawn
6.	Pharmacy Records related to Timia Dubuclet from	DUB-FARBER-000296

No.	Exhibit Description	Bates Range
	Walgreens Pharmacy produced by Plaintiff	through DUB-FARBERT-000339
7.	Medical Records related to Timia Dubuclet from Children's Hospital produced by Plaintiff	DUB-FARBER-000083 through DUB-FARBER-000238
8.	Medical Records related to Timia Dubuclet from Dr. Cesar Parra produced by Plaintiff	DUB-FARBER-000067 through DUB-FARBER-000076
9.	Medical Records related to Timia Dubuclet from Primary Eye Care	DUB001393 through DUB001394
10.	Medical Records related to Timia Dubuclet from John Bull Pharmacy	Dubuclet-John-Bull-Pharmacy -001 through 004
11.	Medical Records related to Timia Dubuclet from Dr. Kathleen McDonald	Dubuclet-Kenner-Dermatology-001 through 030
12.	School Records related to Timia Dubuclet from Lake Forest Charter School	Exhibit 5 to Deposition of Dr. Shwery
13.	School Records related to Timia Dubuclet from Ridgecrest Elementary	Dubuclet-Ridgecrest-Education-001 through 008
14.	True Patch Test 7/6/09 taken by Dr. Farber on Timia Dubuclet	DUB001143 through DUB001146
15.	FEMA forms 95 of Elisha Dubuclet	Exhibits 2 and 3 to the deposition of Elisha Dubuclet taken 10/6/09
16.	Photographs of Timia Dubuclet from the medical records of Kenner Dermatology dated 7/6/09 and 7/8/09 (color photos)	Plaintiff Ex. 212
17.	Original Plaintiff Fact Sheet of Elisha Dubuclet o/b/o Timia Dubuclet dated 6/13/08	
18.	Updated Plaintiff Fact Sheet of Elisha Dubuclet o/b/o Timia Dubuclet dated 7/24/09	Dubuclet-Cole_001 to Dubuclet-Cole_020
19.	Medical Timeline for Timia Dubuclet	Exhibit 8 to Elisha Dubuclet deposition of October 6, 2009
20.	Prescription Timeline for Timia Dubuclet	Exhibit 9 to Elisha Dubuclet deposition of October 6, 2009
21.	Louisiana Uniform Abuse Prevention Order, Case No. 2007-3348, April 10, 2007 relating to Dubuclet family.	FLE-00135334 through FLE-00135339

No.	Exhibit Description	Bates Range
22.	Petition for Protection from Abuse of Elisha Dubuclet, April 11, 2007.	FLE-00135340 through FLE-00135346
	RELATED TO DUBUCLET UNIT	
23.	FEMA documents on Dubuclet unit	FEMA166-000006 through FEMA166-000013
24.	Fluor Dubuclet unit installation documents	FEI 000001 through FEI 000060
25.	FEMA Disaster File on the Dubuclets	FEMA20-000001 through FEMA20-0000142
26.	Certificate of Origin and Transport Documents for Dubuclet unit	Morgan 001049 to 1053 [Parties have stipulated to the information on this document]
27.	Unit Production File	FLE_00010739- FLE_00010747b
28.	Map of location of Dubuclet unit on Dorothea Street	Exhibits 7a and 7b to Elisha Dubuclet deposition of October 6, 2009
29.	Floorplan of Dubuclet unit with markings by Elisha Dubuclet	Exhibits 6 and 6a to Elisha Dubuclet deposition of October 6, 2009.
30.	Photographs of inspection of subject Dubuclet unit by Fleetwood expert Robert Wozniak	FLE_00013954 through FLE_00014082 and FLE_000015180
31.	Photographs of Dubuclet unit as installed	DUB-MOORE-000521 to 528
32.	Photographs of formaldehyde warning as posted in Dubuclet unit.	DUB001014 and Dubuclet-Watson 0064
33.	Test Protocol for Fleetwood Testing of Dubuclet Unit	Dubuclet-Watson_0156 through Dubuclet-Watson_0156_0017
	RELATED TO FLEETWOOD	
34.	2006 Pioneer Owners Manual	FLE-00006495-FLE-00006615
35.	Warning Label with placement directions	FLE-00012455 and FLE-

No.	Exhibit Description	Bates Range
		00005100 through FLE-00005102
36.	RADCO testing performed for Fleetwood	FLE-00006624-FLE-00006891
37.	Fleetwood Master Sales Agreement with Morgan	FLE-0000045-FLE-0000050
38.	Amendment No. 1 to Fleetwood Master Sales Agreement with Morgan	FLE-00006126
39.	Amendment No. 2 to Fleetwood Enterprises, Inc. Master Sales Agreement with Morgan	FLE-00006124 through FLE-00006125
40.	September/October, 2005 Purchase Orders from Morgan to Fleetwood for units	FLE-0000051 to FLE-0000058
41.	9/6/05 E-mail from Doug Henriquez to Guy Morgan and Jim Schilligo regarding comments from Brian McCreary on FEMA specs	Morgan-000147 through Morgan-000148
42.	9/8/05 Schilligo to Fleetwood with Request for Quotes from Brian McCreary and attached FEMA spec dated 8/12/04	Morgan-000087 through Morgan-000089
43.	E-mail dated 8/31/05 from Michael Wagner with government to Guy Morgan on request for proposals for travel trailers and attached travel trailer spec	Morgan-000097 through Morgan-000098
44.	Engineering Standard Bulletin (1984)	FLE-00010936
45.	Engineering Standard Bulletin (1994)	FLE-00010919 through FLE-10935
46.	Engineering Standard Bulletin (December 1997)	FLE-00010913 through FLE-10918
47.	Quality Assurance Manual	FLE-00135333 through FLE-00135477
48.	Travel Trailer Assembly Manual	FLE-00010017 through FLE-00010736 and FLE-00010748 through FLE-00010912
49.	Bill of Materials Manual for FEMA travel trailers (Gary Beatty book)	FLE-00004474 through FLE-00004835
50.	Fleetwood memo from Mike Liveri re FEMA 32FSH specifications, 9/7/05, with specifications dated 9/7/05.	FLE-00005018 through FLE-00005020
51.	11/17/05 FEMA Unit Specifications for 32F/32FD	FLE-00006491;
52.	11/17/05 FEMA Unit Specifications for 32FSH/32DFSH –	FLE-00006492;

No.	Exhibit Description	Bates Range
53.	April 21, 2006 FEMA Travel Trailer Spec	FLE-00007042 to FLE-00007049; [Fleetwood will withdraw unless Plaintiff opens door to this exhibit]
54.	August 12, 2004 FEMA Travel Trailer Spec FLE	FLE-00006914 to FLE-00006917;
55.	List of Fleetwood travel trailer units sold by Fleetwood	FLE-00000148-FLE-00000400 [Fleetwood will withdraw unless Plaintiff opens door to this exhibit]
56.	E-mail from Craig Biazio dated 2/13/06	FLE-00135116 to FLE-00135118;
57.	Customer Complaint Chart	FLE-00014083 to FLE-00014107;
58.	Material Safety Data Sheets relevant to formaldehyde products.	FLE-00002608– FLE-00002735, FLE-00005510 – FLE-00005513, FLE-00002736 – FLE-00004009.
59.	Standard Job Requirements identified by Alby Snyder	FLE-00135127 through FLE-00135131
60.	Various Patrick Industries Invoices	FLE-00014716 to FLE-00014776
61.	Various Continental Lumber Invoices	FLE-2736 through FLE-2820
62.	99 Fed. Reg. (155): 31986 to 32013 (August 8, 1984)	
63.	ASHRAE 62.1 Ventilation for Acceptable Indoor Air Quality – American Society of Heating, Refrigeration, and Air Conditioning Engineers, Inc., Atlanta, GA	
64.	ASHRAE 62.2 Ventilation for Acceptable Indoor Air Quality in Low Rise Residential Buildings – American Society of Heating, Refrigeration, and Air Conditioning Engineers, Inc., Atlanta, GA	
65.	Floor plan for 32FSH unit	FLE00006492
66.	NFPA 1192 Standard for Recreational Vehicles, 2002 Edition	Dubuclet-Serauskas_001 through Dubuclet-Serauskas_047
67.	Floor plan for 32F/32FD	FLE00006491

No.	Exhibit Description	Bates Range
68.	Diagrams of Travel Trailer	FLE-00006493 – FLE00006494; FLE-00007041;
69.	9/8/05 E-mail from Doug Henriquez to Bill Farish	FLE-00002067 to FLE-00002068;
70.	9/22/05 E-mail from Tina Inkrote to various persons regarding shipment of FEMA owner's manuals	FLE-00032706
71.	9/16/06 E-mail from Tina Inkrote to various persons regarding status of orders of Pioneer FEMA Owner's manual	FLE-00032677
72.	9/15/04 E-mail from Tina Inkrote to Terry Pratt regarding changes for the 2006 Pioneer owner's manual, warranty page 1	FLE-00033516
73.	9/15/05 E-mail from Charlie Reick to Tina Inkrote regarding ordering of FEMA owner's manuals	FLE-00033490
74.	9/13/05 E-mail from Charlie Reick to Gary Beatty regarding RVIA tags installed in FEMA units	FLE-00090475
75.	2/06 Email stream, Dave Wells to Kerri Cull to Fleetwood with Engineering Standard referenced therein	FLE-00135116 to 135118 and FLE-0010913 to 10918.
76.	Disney Materials related to Fleetwood	FLE-00135340 through FLE-00135385
EXPERTS		
77.	CV of Fleetwood expert Tony Watson	
78.	Test Protocol for Fleetwood Testing of Dubuclet Unit	Dubuclet_Serauskas_0637 to Dubuclet_Serauskas_653
79.	Photos of inspection of Dubuclet unit	Dubuclet-Watson_0001 through Dubuclet-Watson_0155 and Dubuclet-Watson_0157 through Dubuclet-Watson_0186
80.	CV of Fleetwood expert Dr. Michael Ginevan	
81.	Ginevan, M.E., and D.E. Splitstone. 2003. <i>Statistical Tools for Environmental Quality Measurement</i> . Chapman & Hall / CRC. Chapter 1. Pages 1-16; Chapter 4, pages 81-87.	Exhibit no. 22 to Ginevan deposition
82.	I. Kushch et al 2008 <i>Compounds enhanced in a mass spectrometric profile of smokers' exhaled</i>	Exhibit 9 to Ginevan deposition

No.	Exhibit Description	Bates Range
	<i>breath versus non-smokers as determined in a pilot study using PTR-MS.</i> J. Breath Res. 2. 026002 (26pp)	
83.	B. Moser et al. 2005. <i>Mass spectrometric profile of exhaled breath—field study by PTR-MS.</i> Respiratory Physiology & Neurobiology 145: 295–300	Exhibit 11 to Ginevan deposition
84.	T. Wang et al. 2008. <i>Analysis of breath, exhaled via the mouth and nose, and the air in the oral cavity.</i> J. Breath Res. 2. 037013 (13pp).	Exhibit 10 to Ginevan deposition
85.	J.J. Clary and J.B. Sullivan, Jr. 2001. <i>Chapter 95. Formaldehyde.</i> Clinical Environmental Health and Toxic Exposures (Second Edition). J.B. Sullivan and G. R. Krieger eds.	Dubuclet-Ginevan 259-268
86.	Hewett. P. 1996. <i>Interpretation And Use Of Occupational Exposure Limits For Chronic Disease Agents.</i> Occupational Medicine: State of the Art Reviews. 11: 561-590.	Exhibit 18 to Ginevan deposition
87.	CV of Dr. Philip Cole	
88.	American Cancer Society <i>Guidelines for the Early Detection of Cancer</i> , Last Medical Review: 3/5/2008 and Last Revised 5/21/2009	Dubuclet-Cole_021 to Dubuclet-Cole_023
89.	Cole, Philip and Morrison, Alan S., <i>Basic Issues in Population Screening for Cancer</i> , JNCI, Vol. 64, No. 5., May 1980; 1263-1272.	Dubuclet-Cole_027 through Dubuclet-Cole_036
90.	Cole, Philip, <i>Causality in Epidemiology, Health Policy and Law</i> , Environmental Law Reporter., June 1997. 27 ELR 10279	Dubuclet-Cole_037 through Dubuclet-Cole_048
91.	Cole, Philip and Rodu, Brad, <i>Declining Cancer Mortality in the United States</i> , American Cancer Society 1996. pp 2045-2048	Dubuclet-Cole_049 through Dubuclet-Cole_052
92.	Coggon, David, Harris, E. Clare et al., <i>Extended Follow-Up of a Cohort of British Chemical Workers Exposed to Formaldehyde.</i> Journal of the National Cancer Institute. Vol. 95, No. 21, November 5, 2003.	Dubuclet-Cole_143 to Dubuclet-Cole_150
93.	Boseti, C et al. <i>Formaldehyde and cancer risk: a quantitative review of cohort studies through 2006.</i> Annals of Oncology 19: 29-43, 2008	Dubuclet-Cole_221

No.	Exhibit Description	Bates Range
94.	Cole, Philip and Axten, Charles, <i>Formaldehyde and leukemia: an improbable causal relationship</i> . Regulatory Toxicology and Pharmacology 40 (2004) 107-112.	Dubuclet-Cole_222 to Dubuclet-Cole_227
95.	Miller, Anthony B, <i>Fundamental issues in screening for cancer</i> . Cancer Prevention and Control. pp 1433-1452	Dubuclet-Cole_228 to Dubuclet-Cole_247
96.	World Health Organization International Agency for Research on Cancer, <i>IARC Monographs on the Evaluation of Carcinogenic Risks to Humans. Vol 88, Formaldehyde, 2-Butoxyethanol and 1-tert-Butoxypropan-2-ol</i> , Summary of Data Reported and Evaluated. Dec. 2006	Dubuclet-Cole_248 to Dubuclet-Cole_263
97.	Marsh, Gary M., et al., <i>Mis-specified and non-robust mortality risk models for nasopharyngeal cancer in the National Cancer Institute formaldehyde worker cohort study</i> . Regulatory Toxicology and Pharmacology, 47 (2007) 58-67	Dubuclet-Cole_289
98.	Pinkerton, L E, et al., <i>Mortality among a cohort of garment workers exposed to formaldehyde: an update</i> . Occup. Environ. Med. 2004:61; 193-200	Dubuclet-Cole_290
99.	Beane Freeman, Laura E., et al., <i>Mortality from Lymphohematopoietic Malignancies Among Workers in Formaldehyde Industries: The National Cancer Institute Cohort</i> . JNCI, Article 751. Vol. 101, Issue 10, May 20, 2009	Dubuclet-Cole_291 to Dubuclet-Cole_301
100.	Marsh, Gary M. and Youk Ada O., <i>Reevaluation of mortality risks from nasopharyngeal cancer in the formaldehyde cohort study of the National Cancer Institute</i> . Regulatory Toxicology and Pharmacology 42 (2005) 275-283	Dubuclet-Cole_302
101.	American Cancer Society Guidelines for the Early Detection of Cancer, www.cancer.org	Dubuclet-Cole_303
102.	Screening and Testing to Detect Cancer from National Cancer Institute. www.cancer.org	Dubuclet-Cole-307 to 308
103.	Guide to Clinical Preventive Services, Agency for Healthcare Research and Quality. www.ahrq.gov	Dubuclet-Cole-309 to 315
104.	Cole, Philip and Sateren, Warren, <i>The Evolving</i>	Dubuclet-Cole-316

No.	Exhibit Description	Bates Range
	<i>Picture of Cancer in America</i> , Journal of the National Cancer Institute. Vol. 87, No. 3, February 1, 1995	
105.	Rodu, Brad and Cole, Philip, <i>The Fifty-Year Decline of Cancer in America</i> . Journal of Clinical-Oncology, Vol. 19, No. 1, January 1, 2001: pp 239-241	Dubuclet-Cole-317
106.	Marsh, Gary M. et al., <i>Work in the metal industry and nasopharyngeal cancer mortality among formaldehyde-exposed workers</i> . Regulatory Toxicology and Pharmacology. 48 (2007) 308-319	Dubuclet-Cole-318
107.	Mundt, Kenneth A., <i>A Meta-Analysis of Formaldehyde Exposure and Risk and Risk of Leukemia Nasopharyngeal Cancer</i> . Formaldehyde Council, Inc. and Hexion Speciality Chemicals. October 16, 2009	Dubuclet-Cole-350 to Dubuclet-Cole-395
108.	Duhayon, S., et. al. <i>Carcinogenic potential of formaldehyde in occupational settings: a critical assessment and possible impact on occupational exposure levels</i> . Int. Arch. Occup. Environ. Health (2008) 81: 695-710	Dubuclet-Cole-319 to Dubuclet-Cole-334
109.	Bosetti, C. et. al. <i>Formaldehyde and cancer risk: a quantitative review of cohort studies through 2006</i> . Annals of Oncology 19: 29-43, 2008	Dubuclet-Cole-335 through Dubuclet-Cole-349
110.	CV of Dr. Patricia Farris	
111.	Laughter D, Istvan JA, Tofte SJ, et al. <i>The prevalence of atopic dermatitis in Oregon schoolchildren</i> . J Am Acad Dermatol 2000;43(3):649-655	Dubuclet-Farris_444 to Dubuclet-Farris_450
112.	Pallor AS and Mancini AJ. Hurwitz <i>Clinical Pediatric Dermatology</i> , 3 rd Edition	
113.	Wuthrich B. <i>Clinical aspects, epidemiology, and prognosis of atopic dermatitis</i> . Ann Allergy Asthma Immunol 1999;83(5):860-876	Dubulcet-Farris-432 to Dubuclet-Farris-438
114.	Wolkerstorfer A, Wahn U, Kjellman NI, et al. <i>Natural course of sensitization to cow's milk and hen's egg in childhood atopic dermatitis</i> .	Dubulcet-Farris-054 to Dubuclet-Farris-058
115.	Hill DJ, Sporik R, Thorburn J, et al. <i>The</i>	Dubulcet-Farris-439 to

No.	Exhibit Description	Bates Range
	<i>association of atopic dermatitis in infancy with immunoglobulin E food sensitization. J Pediatr</i> 2000;137(4):475-479	Dubuclet-Farris-443
116.	Elias PM. <i>Epidermal lipids, barrier function and desquamation. J Invest Dermatol.</i> 1983; 80(suppl):44s-49s	
117.	Palmer CN, Irvine AD, Terron-Kwiatkowski A, et al. <i>Loss of function variants of the epidermal barrier protein filaggrin are a major predisposing factor for atopic dermatitis. Nat Genet</i> 2006;38:441-446	Dubulcet-Farris-008 to Dubuclet-Farris-013
118.	Leung DYM, Boguniewicz M, Howell MD et al. <i>New insights into atopic dermatitis. J Clin Invest.</i> 2004;113:651-657	Dubulcet-Farris-014 to Dubuclet-Farris-035
119.	Novak N and Beiber MD. <i>Allergic and nonallergic forms of atopic diseases. J Allergy and Clin Immunol.</i> 2003;112:252-262	Dubulcet-Farris-412 to Dubuclet-Farris-422
120.	Oztas P, Polat M, Cinar L, et al. <i>Shoe dermatitis from para-tertiary butylphenol formaldehyde. Contact Dermatitis</i> 2007;56(5):294-295.	Dubulcet-Farris-423 to Dubuclet-Farris-431
121.	Bruynzeel DP and Maibach HI. <i>Excited skin syndrome (angry back). Arch Dermaol</i> 1986;122(3):323-328	Dubulcet-Farris-366 to Dubuclet-Farris-371
122.	Pasche-Koo F, Hauser C. <i>How to better understand the angry back syndrome. Dermatology</i> 1992;184(4):237-240	Dubulcet-Farris-405 to Dubuclet-Farris-408
123.	Arndt J, Smith N, Tausk F. <i>Stress and atopic dermatitis. Curr Allergy Asthma Rep.</i> 2008;8(4):312-317	Dubulcet-Farris-453 to Dubuclet-Farris-458
124.	Hashizume J, Takigawa M. <i>Anxiety in allergy and atopic dermatitis. Curr Opin Allergy Clin Immunol</i> 2006;6(5):335-339.	Dubulcet-Farris-003 to Dubuclet-Farris-007
125.	Osofsky HJ, Osofsky JD, Kronenberg M, et al. <i>Posttraumatic stress symptoms in children after Hurricane Katriina: predicting the need for mental health services. Am J Orthopsychiatry.</i> 2009;79(2)212-220	Dubulcet-Farris-423 to Dubuclet-Farris-431
126.	Drury SS, Scheeringa MS, Zeanah CH. <i>The</i>	Dubulcet-Farris-036 to

No.	Exhibit Description	Bates Range
	<i>traumatic impact of Hurricane Katrina on children in New Orleans. Child Adolesc Psychiatr Clin N Am. 2008 17(3):685-702</i>	Dubuclet-Farris-053
127.	CV of Dr. William Dyson	
128.	Dooms-Goossens, A. and Deleu, H., <i>Airborne Contact Dermatitis: An Update. Contact Dermatitis (1991); 25:211-17</i>	Dubuclet-Dyson-0001 to Dubuclet-Dyson-0008
129.	Sexton, Ken et al., <i>Formaldehyde Exposures inside Mobile Homes. Environ. Sci. Technol., 1989, 23, 985-988</i>	Dubuclet-Dyson-0009 to Dubuclet-Dyson-0012
130.	Bardana, Emil J., Jr., <i>Occupational Asthma.</i>	Dubuclet-Dyson-0013 to Dubuclet-Dyson-0032
131.	Moser, Berthold, et al., <i>Mass spectrometric profile of exhaled breath-field study by PRT-MS. Respiratory Physiology & Neurbiology 145 (2005) 295-300</i>	Dubuclet-Dyson-0033- Dubuclet-Dyson-0038
132.	Godish, Thad, PhD., <i>Formaldehyde Exposure from Tobacco Smoke: A Review. Public Health Briefs. AJPH August 1989, Vol. 79, No. 8, pp 1044-1045</i>	Dubuclet-Dyson-0039- Dubuclet-Dyson-0040
133.	Kaminski, Jerzy, et al., <i>Determination of Formaldehyde in Fresh and Retail Milk by Liquid Column Chromatography, Journal of AOAC International, Vol. 76, No. 5, 1993</i>	Dubuclet-Dyson-0041- Dubuclet-Dyson-0044
134.	Weng, Xuan. et al., <i>Rapid detection of formaldehyde concentration in food on a polydimethylsiloxane (PDMS) microfluidic chip. Food Chemistry 114 (2009) 1079-1082</i>	Dubuclet-Dyson-0045- Dubuclet-Dyson-0048
135.	Kulle, Thomas J., et al., <i>Formaldehyde Dose-Response in Healthy Nonsmokers, JAPCA 37: 919-924 (1987)</i>	Dubuclet-Dyson-0049- Dubuclet-Dyson-0054
136.	Kulle, Thomas J., <i>Acute Odor and Irritation Response in Healthy Nonsmokers with Formaldehyde Exposure, Inhalation Toxicology, 5:323-332, 1993</i>	Dubuclet-Dyson-0055- Dubuclet-Dyson-064
137.	Bender, Joel, <i>The Use of Noncancer Endpoints as a Basis for Establishing a Reference Concentration for Formaldehyde, Regulatory Toxicology and Pharmacology, 35, 23-31 (2002)</i>	Dubuclet-Dyson-0065- Dubuclet-Dyson-0073

No.	Exhibit Description	Bates Range
138.	Paustenbach, Dennis, <i>A Recommended Occupational Exposure Limit for Formaldehyde Based on Irritation</i> , Journal of Toxicology and Environmental Health, 50: 217-263, 1997	Dubuclet-Dyson-0074- Dubuclet-Dyson-0120
139.	Arts, Josje H.E. et al., <i>Inhaled formaldehyde: Evaluation of sensory irritation in relation to carcinogenicity</i> , Regulatory Toxicology and Pharmacology 44 (2006) 144-160;	Dubuclet-Dyson-0121- Dubuclet-Dyson-0137
140.	Arts, Josje H.E. et al., <i>Setting an indoor air exposure limit for formaldehyde: Factors of concern</i> , Regulatory Toxicology and Pharmacology 52 (2008) 189-194;	Dubuclet-Dyson-0138- Dubuclet-Dyson-0143
141.	Franks, S.J., <i>A mathematical model for the absorption and metabolism of formaldehyde vapour by humans</i> , Toxicology and Applied Pharmacology 206 (2005) 309-320	Dubuclet-Dyson-0144- Dubuclet-Dyson-0155
142.	Frigas, Evangelo, MD, et al., <i>Bronchial Challenge with Formaldehyde Gas: Lack of Bronchoconstriction in 13 Patients Suspects of Having Formaldehyde-Induced Asthma</i> , Mayo Clinic Proceedings, Vol. 59, 295-299, May 1984	Dubuclet-Dyson-0156- Dubuclet-Dyson-0160
143.	Schachter, E. N., M.D. <i>Respiratory Effects of Exposure to 2.0 PPM of Formaldehyde in Asthmatic Subjects</i> , Air Pollution: Environmental and Occupational Health.	Dubuclet-Dyson-0161- Dubuclet-Dyson-0169
144.	Schachter, E. Neil, MD, <i>A Study of Respiratory Effects from Exposure to 2 ppm Formaldehyde in Healthy Subjects</i> . Archives of Environmental Health, July/August 1986, Vol. 41, No. 4	Dubuclet-Dyson-00170- Dubuclet-Dyson-0172
145.	Schachter, E. Neil, MD, <i>A Study of Respiratory Effects from Exposure to 2.0 ppm Formaldehyde in Occupationally Exposed Workers</i> , Environmental Research, 44, 188-205 (1987)	Dubuclet-Dyson-0173- Dubuclet-Dyson-0190
146.	Rumchev, K, et al., <i>Association of domestic exposure to volatile organic compounds with asthma in young children</i> . Thorax 2004, 59:746-751	Dubuclet-Dyson-0191- Dubuclet-Dyson-0202
147.	Franklin, Peter J., <i>Indoor air quality and respiratory health of children</i> , Paediatric Respiratory Reviews	Dubuclet-Dyson-0203- Dubuclet-Dyson-0208

No.	Exhibit Description	Bates Range
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148.	Harving, Henrik, <i>Pulmonary Function and Bronchial Reactivity in Asthmatics During Low-Level Formaldehyde Exposure</i> . Lung (1990) 168:15-21	Dubuclet-Dyson-0209- Dubuclet-Dyson-0215
149.	Harving, Henrik, <i>Low concentrations of formaldehyde un bronchial asthma: a study of exposure under controlled conditions</i>	Dubuclet-Dyson-0216
150.	Lee, Hye Kyung, <i>Induction of Formaldehyde Sensitivity in Guinea Pigs</i> , Toxicology and Applied Pharmacology 75, 147-155 (1984)	Dubuclet-Dyson-0217- Dubuclet-Dyson-0225
151.	Kranke, B. and Aberer, W., <i>Indoor exposure to formaldehyde and risk of allergy</i> , Allergy 2000: 55, 402-404	Dubuclet-Dyson-0226- Dubuclet-Dyson-0228
	CV of Dr. Howard Maibach	
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152.	Agathos, M. The formaldehyde problem [ZUR FORMALDEHYD-PROBLEMATIK] 1987 <i>H+G Zeitschrift fur Hautkrankheiten</i> 62 (24), pp. 1696+1699-1702	
153.	Agner, et al, <i>Standardization of the TRUE Test imidazolidinyl urea and diazolidinyl urea patches</i> , Contact Dermatitis 2001, 34, 21-25	Dubuclet-Maibach-0028 to Dubuclet-Maibach-032
154.	Ale, S., Maibach, H., <i>Reproducibility of Patch Test Results: A Concurred Right-Versus Left Study Using T.R.U.E. Test™</i> , Contact Derm. 2004: 50:304-312;	
155.	Ale S., Maibach H. (2002) <i>Scientific basis of patch testing</i> . Dermatol Beruf Umwelt 50:43-50, 91-96, 131-133	
156.	Ale S., Maibach H. (1995) <i>Clinical relevance in allergic contact dermatitis</i> . Dermatosen 43:119-12	
157.	Springer, Berlin. <i>Handbook of Occupational dermatology</i> . pp. 344-350.	
158.	Andersen, K.E., Maibach, H. I., <i>Contact Allergy Predictive Tests in Guinea Pig</i> . Current Problems in Dermatology	Dubuclet-Maibach-0089 to Dubuclet-Maibach-0109
159.	Ale S., Maibach H. (2001) <i>Operational definition of occupational allergic contact dermatitis</i> . In:	

No.	Exhibit Description	Bates Range
	Kanerva L., Menné T., Wahlberg J., Maibach H. (eds)	
160.	Baba, K. <i>Measurement of formaldehyde-specific IgE antibodies in adult asthmatics.</i> 2000 Japanese Journal of Allergology 49 (5): 404-411	
161.	Bean Freeman, Laura E., et. al. <i>Mortality from Lymphohematopoietic Malignancies Among Workers in Formaldehyde Industries: The National Cancer Institute Cohort.</i> JCN, Vol 101, Issue 10, May 20, 2009	
162.	Bergh et al, <i>Sensitizing potential of acetaldehyde and formaldehyde using a modified cumulative contact enhancement test (CCET),</i> Contact Dermatitis 1999, 46, 139-145	Dubuclet-Maibach-0231 to Dubuclet-Maibach-0237
163.	Bergh, M., et al. Contact allergenic activity of Tween® 80 before and after air exposure 1997 <i>Contact Dermatitis</i> 37 (1), pp. 9-18	Dubuclet-Maibach-0291 to Dubuclet-Maibach-0301
164.	Bergh, <i>Formation of formaldehyde and peroxides by air oxidation of high purity polyoxyethylene surfactants.</i> 1998 <i>Contact Dermatitis</i> 39 (1): 14-20	Dubuclet-Maibach-0368 to Dubuclet-Maibach-0375
165.	Boukhan and Maibach, <i>Thresholds in contact sensitization: Immunologic mechanisms and experimental evidence in humans – an overview.</i> Food and Chemical Toxicology 39 (2001) 1125-1134	Dubuclet-Maibach-0469 to Dubuclet-Maibach-0478
166.	Brennkmeijer, et al., <i>Clinical Differences Between Atopic and Atopiform Dermatitis</i>	
167.	Brozek, J.L., et. al., <i>Grading Quality of Evidence and Strength of Recommendations in Clinical Practice Guidelines: Part 2 of 3.</i> Allergy 2009	
168.	Bruze et al, <i>Cross-reaction patterns in patients with contact allergy to simply methylol phenols.</i> Contact Dermatitis 1997, 37, 82-86	
169.	Bruze, Magnus, Fregert, Sigerid, Zimerson, Erik, <i>Contact allergy to phenol-formaldehyde resins.</i> Contact Dermatitis 1985: 12: 81-86	Dubuclet-Maibach_0033 to Dubuclet-Maibach_0042
170.	Burden et al, <i>Contact hypersensitivity induced by p-tert-butylphenol-formaldehyde resin in an adhesive</i>	Dubuclet-Maibach_0043 to Dubuclet-Maibach_0044

No.	Exhibit Description	Bates Range
	<i>dressings</i> ; Contact Dermatitis 1994, 31:276	
171.	Burk, C.J. <i>Avoid medications with formaldehyde in patients with contact allergies.</i> 2007 <i>Pediatric Annals</i> 36 (7) July: 378	Dubuclet-Maibach_0045 to Dubuclet-Maibach_0049
172.	DeLeo, <i>The effect of race and ethnicity on patch test results</i> , 2002 <i>Journal of the American Academy of Dermatology</i> 46(2), Part 3: S107-S112	Dubuclet-Maibach_0050 to Dubuclet-Maibach_0055
173.	Dooms-Goossens, A. and Deleu, H., <i>Airborne Contact Dermatitis: An Update.</i> <i>Contact Dermatitis</i> (1991); 25:211-17	Dubuclet-Maibach_0056 to Dubuclet-Maibach_0063
174.	Eberlein-Konig, Bernadette, et. al. <i>Change of Skin Roughness due to Lowering Air Humidity in a Climate Chamber.</i> <i>Acta Derm Venereol</i> (stockh) 1996; 76; 447-449	
175.	Eberlein-Konig, Bernadette, et. al. <i>Influence of Airborne Nitrogen Dioxide or Formaldehyde on Parameters of Skin Function, et. al.</i> , <i>J. Allergy Clin. Immunol.</i> January, 1998	Dubuclet-Maibach-0064 to Dubuclet-Maibach-0066
176.	Ezughah, Francesca, et. al. <i>Occupational Airborne Allergic Contact Dermatitis from Medium Density Fibreboard Containing Phenol-Formaldehyde Resin-2 (PFR-2).</i> <i>Contact Dermatitis.</i> 2001, 45, 242	Dubuclet-Maibach-0067
177.	Feinman, Susan E., <i>Formaldehyde Sensitivity and Toxicity.</i>	
178.	Fisher et al, <i>Clinical Standardization of the TRUE Test™ Formaldehyde Patch</i> , <i>Curr Prob Dermatol.</i> Basel, Karger, 1995, 22, 24-30	Dubuclet-Maibach-0068 to Dubuclet-Maibach-0074
179.	Fisher, AA. <i>Dermatitis due to the presence of formaldehyde in certain sodium lauryl sulfate (SLS) solutions</i> 1981 <i>Cutis</i> 27 (4), pp. 360-362+366	
180.	Fischer, T., et al. <i>Clinical standardization of the TRUE Test formaldehyde patch.</i> 1995 <i>Current problems in dermatology</i> 22, pp. 24-30	
181.	Flyvholm et al, <i>Comparison of 2 tests for clinical assessment of formaldehyde exposure</i> , <i>Contact Dermatitis</i> 1996, 34, 35-38	Dubuclet-Maibach-0075 to Dubuclet-Maibach-0079
182.	Flyvholm et al, <i>Threshold for occluded</i>	Dubuclet-Maibach-0080 to

No.	Exhibit Description	Bates Range
	<i>formaldehyde patch test in formaldehyde-sensitive patients, Contact Dermatitis 1997, 36, 26-33</i>	Dubuclet-Maibach-0088
183.	Flyvholm, <i>Preservatives in registered chemical products. 2005 Contact Dermatitis 53(1): 27-32</i>	Dubuclet-Maibach-0110 to Dubuclet-Maibach-0115
184.	<i>Formaldehyde: A Knowledge Pooling and Risk Assessment. A Progress Report from the Sweden Environmental Objectives Council, de facto 2003</i>	
185.	Frankild, Soren, et. al. <i>Comparison of the Sensitivities of the Buehler Test and the Guinea Pig Maximization Test for Predictive Testing of Contact Allergy. Acta. Derm. Venereol 2000, 80: 256-2621</i>	
186.	Frosch, P. J., et. al. <i>Contact Dermatitis. 4th Edition.</i>	
187.	Garcia Gavin J. <i>Allergic contact dermatitis from melamine formaldehyde in a patient with a negative patch test to formaldehyde. 2008 Dermatitis: contact, atopic, occupational, drug: Official Journal of the American Contact Dermatitis Society, North American Contact Dermatitis Group 19 (2) March: E5-6</i>	
188.	Geldof, B. A. <i>Clinical aspects of para-tertiary-butylphenolformaldehyde resin (PTBP-FR) allergy. 1989 Contact Dermatitis 21 (5): 312-315</i>	Dubuclet-Maibach-0116 to Dubuclet-Maibach-0119
189.	Gustafson, Pernilla, Barregard, Lars, Lindahl, Roger, Sallsten, Gerd, <i>Formaldehyde levels in Sweden: personal exposure, indoor, and outdoor concentrations. Journal of Exposure Analysis and Environmental Epidemiology (2005) 15, 252-260</i>	
190.	Haahtela et al, <i>Finnish allergy programme 2008-2018 – time to act and change the course. Allergy. 2008, 63: 634-645</i>	Dubuclet-Maibach-0120 to Dubuclet-Maibach-0131
191.	Hansen, Jens, et al., <i>Proallergenof formaldehyde applied in patch testing of formaldehyde contact allergy, J. Am Acad Dermatol 1989; 21: 838040)</i>	
192.	Hatch and Maibach, <i>Textile Dermatitis: An Update. Contact Dermatitis. 1995, 32. 319-326</i>	Dubuclet-Maibach-0132 to Dubuclet-Maibach-0140
193.	Hausen, <i>p-tert.-Butylphenol-Formaldehydharz</i>	
194.	Hausen, <i>p-tert.-Butylphenol (PTBP)</i>	
195.	Held E., Juhansen, J.D., Agner T., Menne T.,	Dubuclet-Maibach-0141 to

No.	Exhibit Description	Bates Range
	<i>Contact allergy to cosmetics: testing with patients' own products. Contact Dermatitis 1999 40:310</i>	Dubuclet-Maibach-0146
196.	Heine, G. <i>Type IV sensitization profile of individuals with atopic eczema: Results from the Information Network of Depts. of Dermatology (IVDK) and the German Contact Dermatitis Research Group (DKG). 2006 Allergy: European Journal of Allergy and Clinical Immunology 61(5): 611-616</i>	
197.	Helander, I. <i>Contact urticaria from leather containing formaldehyde 1977 Archives of Dermatology 113 (10), pp. 1443</i>	Dubuclet-Maibach-0147
198.	Hilton, J. <i>Estimation of relative skin sensitizing potency using the local lymph node assay: A comparison of formaldehyde with glutaraldehyde. 1998 American Journal of Contact Dermatitis 9 (1): 29-33</i>	
199.	Hilton, J. <i>Experimental Assessment of the sensitizing properties of formaldehyde. 1996 Food and Chemical Toxicology 34, 571-578</i>	
200.	Hogeling M., Pratt, M. <i>Allergic contact dermatitis in children: the Ottawa hospital patch-testing clinic experience, 1996-2006. Dermatitis 2008 19:86</i>	Dubuclet-Maibach-0148 to Dubuclet-Maibach-0151
201.	Holness, D. Linn, M.D., Nethercott, James R., MD. <i>Health Status of Funeral Service Workers Exposed to Formaldehyde, Arch. Environ. Health (1989) 44:222-228</i>	Dubuclet-Maibach-0152 to Dubuclet-Maibach-0158
202.	Isaksson, M. <i>Can an imidazolidinyl urea-preserved corticosteroid cream be safely used in individuals hypersensitive to formaldehyde? 2006 Contact Dermatitis 54 (1) January: 29-34</i>	Dubuclet-Maibach-0159 to Dubuclet-Maibach-0165
203.	Jenson, <i>Course of contact allergy in consecutive eczema patients patch tested with TRUE Test panels 1 and 2 at least twice over a 12-year period. 2005 Contact Dermatitis 52(5): 242-246</i>	Dubuclet-Maibach-0166 to Dubuclet-Maibach-0171
204.	Kalimo, K., et al. <i>Immediate and delayed type reactions to formaldehyde resin in glass wool 1980 Contact Dermatitis 6 (7), pp. 496</i>	Dubuclet-Maibach-0180

No.	Exhibit Description	Bates Range
205.	Kaniwa, <i>Chemical Approach to contact dermatitis caused by household products VII: p-tert-butylphenol-formaldehyde resin in commercially available adhesive tapes, shoes and adhesives for rubber and leather.</i> 1991 <i>Eisei Kagaku</i> 37(1): 58-67	Dubuclet-Maibach-0181 to Dubuclet-Maibach-0190
206.	Krzyzanowski M, Quackenboss JJ, Lebowitz M. <i>Chronic respiratory effects of indoor formaldehyde exposure.</i> <i>Environ Res</i> 1990 52:117	Dubuclet-Maibach-0191 to Dubuclet-Maibach-0199
207.	Lachapelle, Jean-Marie and Maibach, Howard. <i>Patch Testing and Prick Testing.</i> Second Edition. 2009.	
208.	Lever, R. <i>Allergic contact dermatitis in atopic dermatitis.</i> 1992 <i>Acta Dermato-Venereologica</i> 176: 95-98 Lindskov, R. <i>Contact urticaria to formaldehyde</i> 1982 <i>Contact Dermatitis</i> 8 (5), pp. 333-334	Dubuclet-Maibach-0200 to Dubuclet-Maibach-0203
209.	Lindskov, R. <i>Contact urticaria to formaldehyde</i> 1982 <i>Contact Dermatitis</i> 8 (5), pp. 333-334	Dubuclet-Maibach-0204 to Dubuclet-Maibach-0205
210.	Makela et al, <i>Contact sensitivity and atopic dermatitis: association with prognosis, a follow-up study in 801 atopic patients.</i> <i>Contact Dermatitis.</i> 2007, 56:76-78	Dubuclet-Maibach-0206 to Dubuclet-Maibach-0210
211.	Matsunaga, Miyaka, et. al. <i>Ambient Formaldehyde Levels and Allergic Disorders Among Japanese Pregnant Women: Baseline Data from the Osaka Maternal and Child Health Study.</i> <i>Ann Epidemiol</i> 18:78-84, 2008	Dubuclet-Maibach-0211 to Dubuclet-Maibach-0217
212.	Massone <i>Sensitization to para-tertiary-butylphenolformaldehyde resin.</i> 1996 <i>International Journal of Dermatology</i> 35 (3): 177-180	Dubuclet-Maibach-0218 to Dubuclet-Maibach-0221
213.	Maurice, F., et al. <i>Anaphylactic shock caused by formaldehyde in a patient undergoing long-term hemodialysis</i> 1986 <i>Journal of Allergy and Clinical Immunology</i> 77 (4), pp. 594-597	Dubuclet-Maibach-0222 to Dubuclet-Maibach-0225
214.	Meding et al, <i>Hand eczema extent and morphology – Association and influence on long term prognosis.</i> <i>The Society for Investigative Dermatology.</i> 2007,	Dubuclet-Maibach-0226 to Dubuclet-Maibach-0230

No.	Exhibit Description	Bates Range
	126, 2147-2151	
215.	Meding et al, <i>Fifteen-year follow-up of hand eczema: Predictive factors</i> . The Society for Investigative Dermatology. 2005, 124, 893-895	Dubuclet-Maibach-0238 to Dubuclet-Maibach-0242
216.	Meding et. al., <i>Fifteen-year follow-up of hand eczema: persistence and consequences</i> . British Journal of Dermatology. 2005, 975-980	Dubuclet-Maibach-0243 to Dubuclet-Maibach-0238
217.	Meding et al, <i>Predictive factors for hand eczema</i> . Contact Dermatitis. 1990, 23, 154-161	Dubuclet-Maibach-0249 to Dubuclet-Maibach-0256
218.	Mirshaahpanah P., Maibach, H., <i>Relationship of patch test positivity in a general versus and eczema population</i> . Contact Dermatitis 2007 56:125	Dubuclet-Maibach-0257 to Dubuclet-Maibach-0262
219.	Miyake, Y. et al., <i>Dietary Intake of Seaweed and Minerals and Prevalence of Allergic Rhinitis in Japanese Pregnant Females: Baseline Data From the Osaka Maternal and Child Health Study</i> , AEP Vol. 16, No. 8, August 2006: 614-621	
220.	Miyamoto, Y, et al., <i>Fat and Fish Intake and Asthma in Japanese Women: Baseline Data From the Osaka Maternal and Child Health Study</i> , INT J TUBERC LUNG DIS 2007, 11(1): 103-109	
221.	Molina, CI, et al. <i>Formalin allergy and odontostomatology</i> [Allergie au formol et odontostomatologie] 1971 Revue Francaise d'Allergologie 11 (1), pp. 11-18	Dubuclet-Maibach-0263 to Dubuclet-Maibach-0270
222.	Nilsson, <i>Contact sensitivity and urticaria in "wet" work</i> . Contact Dermatitis. 1985, 13: 321-328	Dubuclet-Maibach-0271 to Dubuclet-Maibach-0278
223.	Norback, D., Bjornsson, E., Janson, C., Widstrom, J, Boman, G, <i>Asthmatic symptoms and volatile organic compounds, formaldehyde, and carbon dioxide in dwellings</i> . Occupational and Environmental Medicine 1995: 52: 388-395	
224.	Patterson, R., et al. <i>Formaldehyde reactions and the burden of proof</i> 1987 The Journal of Allergy and Clinical Immunology 79 (5), pp. 705-706	
225.	Pedersen, NB. <i>Occupational hand eczema from formaldehyde in price labels</i> 1980 Contact Dermatitis 6 (1), pp. 57-58	Dubuclet-Maibach-029 to Dubuclet-Maibach-0280

No.	Exhibit Description	Bates Range
226.	Perret, CM, et al. <i>Contact sensitivity do diazolidinyl urea (Germall II) 1989 Archives of Dermatological Research 281 (1), pp. 57-59</i>	Dubuclet-Maibach-0281 to Dubuclet-Maibach-0283
227.	Piletta-Zanin, P. <i>Detection of formaldehyde in moistened baby toilet tissues. 1998 Contact Dermatitis 38 (1): 46</i>	
228.	Rani, Z. <i>Allergic contact dermatitis: A comparison between atopic and non-atopic individuals. 2002 Medical Forum Monthly 13(4): 23-25</i>	Dubuclet-Maibach-0284 to Dubuclet-Maibach-0286
229.	Rani, Z. <i>Allergy to para-tertiary butylphenol formaldehyde resin in general population: a retrospective analysis of 37 cases. 2002 Journal of Pakistan Association of Dermatologists 12 (Oct/Dec): 171-174</i>	Dubuclet-Maibach-0287 to Dubuclet-Maibach-0290
230.	Sakai, Kiyoshi, et. al., <i>A Comparison of Indoor Air Pollutants in Japana and Sweden: formaldehyde, nitrogen dioxide, and chlorinated volatile organic compounds. Environmental Research 94 (2004) 75-85</i>	Dubuclet-Maibach_0001 to Dubuclet-Maibach_
231.	Sanchez, I. <i>Occupational dermatitis due to formaldehyde in newspapers. 1997 Contact Dermatitis 37 (3): 131-132</i> Salphale et al, <i>Contact Points, Contact Dermatitis 2003, 48, 162-177</i>	
232.	Salphale et al, <i>Contact Points, Contact Dermatitis 2003, 48, 162-177</i>	Dubuclet-Maibach_012 to Dubuclet-Maibach_027
233.	Scheman, A. <i>Contact dermatitis alternatives 2003. 2003 Advances in Dermatology 19: 113-138</i>	Dubuclet-Maibach-0318 to Dubuclet-Maibach-0321
234.	Schuppli, R. <i>On the problem of formalin allergy [Zur Frage der Formalin-Allergie.] 1967 Dermatologica 134 (5), pp. 257-261</i>	Dubuclet-Maibach-0322 to Dubuclet-Maibach-0326
235.	Shono et al, <i>Allergic contact dermatitis from para-tertiary-butylphenol-formaldehyde resin (PTBR-FR) in athletic tape and leather adhesive. Contact Dermatitis. 1991, 24:282-288</i> Sugai, T., et al. <i>Decrease in the incidence of contact sensitivity to formaldehyde 1980 Contact Dermatitis 6 (2), pp. 154</i>	Dubuclet-Maibach-0327 to Dubuclet-Maibach-0344
236.	Sugai, T., et al. <i>Decrease in the incidence of</i>	Dubuclet-Maibach-0335

No.	Exhibit Description	Bates Range
	<i>contact sensitivity to formaldehyde</i> 1980 Contact Dermatitis 6 (2), pp. 154	
237.	Susitaival et. al., <i>Hand eczema in Finnish farmers</i> , Contact Dermatitis, 1995, 32, 150-155	Dubuclet-Maibach-0336 to Dubuclet-Maibach-0341
238.	Takahashi S, Tsuji K, Fujii K, et. al. <i>Prospective study of clinical symptoms and skin test reactions in medical students exposed to formaldehyde gas</i> . J Dermatol 2007 34:283	Dubuclet-Maibach-0342 to Dubuclet-Maibach-0348
239.	Tanglertsampan, Churchai, <i>Allergic Contact Dermatitis from Formaldehyde from Initially Negative Repeated Open Application Test</i> . Contact Points. Contact Dermatitis 2003; 48: 162-177	
240.	Trattner et al, <i>Formaldehyde concentration in diagnostic patch testing: comparison of 1% with 2%</i> , Contact Dermatitis 1998, 38, 9-13	Dubuclet-Maibach-0349 to Dubuclet-Maibach-0354
241.	Uter et al, <i>The impact of meteorological conditions on patch test results with 12 standard series allergens (fragrances, biocides, topical ingredients)</i> , Contact Dermatitis and Allergy, British Journal of Dermatology 2008, 158, 734-739	Dubuclet-Maibach-0355 to Dubuclet-Maibach-0360
242.	Uter, et. al. <i>Another Look at Seasonal Variation in Patch Test Results</i> . Contact Dermatitis. 2001. 44, 146-152	Dubuclet-Maibach-0361 to Dubuclet-Maibach-0367
243.	Van Hecke, E., et al. <i>Where next to look for formaldehyde?</i> 1994 Contact Dermatitis 31 (4), pp. 268	Dubuclet-Maibach-0376
244.	von Hertzen et al, <i>Scientific rationale for the Finnish Allergy Programme 2008 – 2018: emphasis on prevention and endorsing tolerance</i> . Allergy. 2009, 64: 678-701	Dubuclet-Maibach-0377 to Dubuclet-Maibach-0400
245.	Wantke F, Demmer CM, Tappler P., et. al. <i>Exposure to formaldehyde and phenol during an anatomy dissecting course: sensitizing potency of formaldehyde in medical students</i> . Allergy 2000 55:84-87	
246.	Warshaw EM, Ahmed RL, Belsito DV et. al. <i>Contact dermatitis of the hands: cross-sectional analyses of North American Contact Dermatits</i>	Dubuclet-Maibach-0401 to Dubuclet-Maibach-0414

No.	Exhibit Description	Bates Range
	<i>Group Data 1994-2004 .J Am Acad Dermatol 2007 57:301</i>	
247.	Warshaw EM, Belsito DV, DeLeo VA, et. al. <i>North American Contact Dermatitis Group patch test results 2003-2004 study period. Dermatitis 2008 19:129</i>	Dubuclet-Maibach-0415 to Dubuclet-Maibach-0422
248.	Westburg, Hakan, et. al. <i>Exposure to Low Molecular Weight Isocyanates and Formaldehyde in Foundries Using Hot Box Core Binders. Ann. Occup. Hyg., Vol. 49, No. 8, pp 719-725, 2005</i>	
249.	Zachariae, C. <i>Experimental elicitation of contact allergy from a diazolidinyl urea preserved cream in relation to anatomical region exposure. 2005 Contact Dermatitis 53 (5): 268-277</i>	Dubuclet-Maibach-0423 to Dubuclet-Maibach-0432
250.	Zachariae et al, <i>ROAT: morphology of ROAT on arm, neck and face in formaldehyde and iazolidinyl urea sensitive individuals. Contact Dermatitis. 2006, 54: 21-24</i>	Dubuclet-Maibach-0433 to Dubuclet-Maibach-0436
251.	Zaghi and Maibach, <i>Quantitative Relationships Between Patch Test Reactivity and Use Test Reactivity: An Cutaneous and Ocular Toxicology, 2008, 27, 241-248</i>	Dubuclet-Maibach-0437 to Dubuclet-Maibach-0444
252.	Zhai, Hongbo, et. al. <i>Dermatoxicology 7th Edition</i>	
253.	Zimerson et al, <i>Contact allergy to 5,5'-di-tert-butyl-2,2'-dihydroxy-(hydroxymethyl)-dibenzyl ethers, sensitizers in p-tert-butylphenol-formaldehyde resin, Contact Dermatitis 2000, 43, 20-26</i>	Dubuclet-Maibach-0445 to Dubuclet-Maibach-0451
254.	Zimerson, <i>Contact Allergy to trimers in p-tert-butylphenol-formaldehyde resin, 2002 Exogenous Dermatology 1(4): 207-216</i>	Dubuclet-Maibach-0452 to Dubuclet-Maibach-0461
255.	Zimerson, Erik, Bruze, Magnus. <i>Contact allergy to the monomers in p-tert-butylphenol-formaldehyde resin. Contact Dermatitis 2002, 46, 147-153</i>	Dubuclet-Maibach-0462 to Dubuclet-Maibach-0468
256.	Zug KA, Warshaw EM, Fowler JF Jr., et. al. <i>Patch test results of the North American Contact Dermatitis Group 2005-2006. Dermatitis 2009 20:149</i> IARC Monographs on Evaluation of Carcinogen Risks in Human, Vol 88, 2006,	Dubuclet-Maibach-0469 to Dubuclet-Maibach-0490

No.	Exhibit Description	Bates Range
	<i>Formaldehyde, 2-Butoxyethanol, 1-tert-Butoxypropan-2-ol</i>	
257.	IARC Monographs on Evaluation of Carcinogen Risks in Human, Vol 88, 2006, <i>Formaldehyde, 2-Butoxyethanol, 1-tert-Butoxypropan-2-ol</i>	
258.	US Department of Health and Human Services, CDC, NIOSH, <i>Occupational Exposure to Formaldehyde</i> , December 1976, Parts I thru IV	
259.	Consumer Product Safety Commission, <i>An Update on Formaldehyde, 1997</i>	
260.	US Department of Health and Human Services, ATSDR, <i>Toxicological Profile for Formaldehyde</i> , July 1999	
261.	Centers for Disease Control, ATSDR, <i>Health Consultation, Formaldehyde Sampling of FEMA Temporary Housing Units</i> , February 1, 2007 and October 2007	
262.	US Environmental Protection Agency, <i>Formaldehyde: Preliminary Risk Assessment for the Registration Eligibility Decision</i> , April 7, 2008	
263.	Centers for Disease Control, ATSDR, <i>Final Report on Formaldehyde Levels in FEMA Supplied Travel Trailers, Park Models and Mobile Homes</i> , July 2, 2008	
264.	US Environmental Protection Agency, <i>Integrated Risk Information System, Formaldehyde, CASRN 50-00-0)</i>	
265.	Centers for Disease Control, ATSDR, <i>Update and Revision of February 2007 Health Consultation Formaldehyde Sampling of FEMA Housing Units</i> , July 30, 2009	
266.	Isaksson, Marlene, et. al. <i>Which Test Chambers should be used for acetone, ethanol, and water solutions when patch testing? Contact Dermatitis</i> 2007; 57: 134-136;	
267.	Gilpin, Sarah, et. al. <i>Volatility of Fragrance Chemical: Patch Testing Implications. Dermatitis</i> , Vol. 20, No. 4 (July/August) 2009, pp. 200-207	

No.	Exhibit Description	Bates Range
268.	Bruze, Magnus, et. al. <i>Recommendation of Appropriate Amounts of Petrolatum Preparation to be Applied at Patch Testing.</i> Contact Dermatitis. 2007; 56: 281-285.	
269.	Bruze, Magnus. <i>Contact Sensitizers in Resins Based on Phenol and Formaldehyde.</i> Dept. of Occupational Dermatology, Dept. of Dermatology, University of Lund. Lund, Sweden. 1985	
270.	Zimerson, Erik <i>Contact Allergens in p-tert-Butylphenol-Formaldehyde Resin</i> Dept. of Occupational and Environmental Dermatology. Dept. of Dermatology and Venereology. Malmö University Hospital. Malmö 2000	
271.	CV of Dr. Robert James	
272.	ROBERT JAMES RELIANCE FILE	
273.	CV of Dr. H. James Wedner	
274.	Akdis, M., Verhagen, J., Blaser, K., Akdis, C.A. Role of T Cells in Atopic Eczema in Handbook of Atopic Eczema 2ed., Eds J Ring, 8. Przybilla and T. Ruzicka, Berlin, Springer-Verlag, 2006 pp323-329	
275.	Eberlein-Konig, B., Huss-Marp, j., Behrebdt, H., Ring, J., Environmental Pollution and Atopic Eczema, Ibid pp381-388	
276.	Using olfaction to study memory. Eichenbaum H. Annals of the New York Academy of Sciences. 855:657-69, 199	
277.	The prevalence of IgE sensitization to formaldehyde in asthmatic children. Doi S., Suzuki S., Morishita M., Yamada M., Kanda Y., Torii S., Sakamoto T. Allergy. 58(7):668-71, 2003	
278.	J Allergy Clin Immunol., The natural course of atopic dermatitis from birth to 7 years and the association with asthma, 2004, 113:925-931	
279.	Novak, N and Beiber, MD., Allergic and nonallergic forms of atopic diseases., J Allergy and Clin Immunol. 2003, 112:252-262	
280.	Paracelsus and the science of nutrition in the renaissance. On occasion of the 500th anniversary	

No.	Exhibit Description	Bates Range
	of his birth. Guggenheim KY. Journal of Nutrition. 123(7):1189-94, 1993.	
281.	Clinical aspects of para-tertiary-butylphenolformaldehyde resin (PTBP-FR) allergy. Geldof BA. Roesyanto ID. van Joost T. Contact Dermatitis. 21(5):312-5, 1989	
282.	Whan, U., et al., IgE antibody responses in young children with atopic dermatitis., Pediatric Allergy and Immunology, 2008, 19:332-336	
283.	CV of Gary Marsh	
284.	Beane Freeman L, Blair A, Lubin J, Stewart P, Hayes R, Hoover R, Hauptmann M, 2009. Mortality from lymphohematopoietic malignancies among workers in formaldehyde industries : the National Cancer Institute report. J. Natl. Cancer Institute 101:751-761	
285.	Blair, A., Stewart, P., O'Berg, M., et al., 1986. Mortality among industrial workers exposed to formaldehyde. J. Natl. Cancer Institute 76, 195-215.	
286.	Blair, A., Stewart, P.A., Hoover, R.N., Fraumeni Jr., J.F., 1987. Cancers of the nasopharynx and oropharynx and formaldehyde exposure [letter]. J. Natl. Cancer Institute 78, 191.	
287.	Blair A, Saracci R, Stewart PA, et al., 1990. Epidemiological evidence on the relationship between formaldehyde exposure and cancer. Scandinavian Journal of Work Environment and Health 16:381-393.	
288.	Blair A, Saracci R, Stewart PA, et al., 1990. Epidemiological evidence on the relationship between formaldehyde exposure and cancer. Scandinavian Journal of Work Environment and Health 16:381-393.	
289.	Coggon, D., Harris, E.C., Poole, J., Palmer, K.T., 2003. Extended follow-up of a cohort of british chemical workers exposed to formaldehyde. J.Natl. Cancer Inst. 95, 1608-	

No.	Exhibit Description	Bates Range
	1615.	
290.	Hauptmann, M., Lubin, J.H., Stewart, P.A., Hayes, R.B., Blair, A., 2003. Mortality from lymphohematopoietic malignancies among workers employed in formaldehyde industries. J. Natl. Cancer Inst. 95, 1615–1623.	
291.	Hauptmann, M., Lubin, J. H., Stewart, P. A., Hayes, R. B., and Blair, A., 2004. Mortality from solid cancers among workers in formaldehyde industries. Am. J. Epidemiol. 159,1117-1130	
292.	IARC, 2006. IARC monographs on the evaluation of the carcinogenic risk to humans. Vol. 86: Formaldehyde, 2-Butoxyethanol and 1-tert-Butoxypropan-2-ol. Lyon: IARC Press.	
293.	Marsh, G.M., Stone, R.A., Esmen, N.A., et al., 1994. Mortality patterns among chemical plant workers exposed to formaldehyde and other substances. J. Natl. Cancer Institute 86, 384-385.	
294.	Marsh, G.M., Stone, R.A., Esmen, N.A., et al., 1996. Mortality patterns among chemical workers in a factory where formaldehyde was used. Occup. and Environ. Med. 53, 613- 617.	
295.	Marsh, G.M., Youk, A.O., Buchanich, J.M., Cassidy, L.D., Lucas, L.J., Esmen, N.A., and Gathuru, I.M., 2002. Pharyngeal cancer mortality among chemical plant workers exposed to formaldehyde. Toxicol. Ind. Health 18, 257-268.	
296.	Marsh, G.M., Youk, A.O., 2004. Reevaluation of mortality risks from leukemia in the formaldehyde cohort study of the National Cancer Institute. Regulatory Toxicology and Pharmacology 40, 113–124.	
297.	Marsh, G.M., Youk, A.O., 2005. Reevaluation of mortality risks from nasopharyngeal cancer in the formaldehyde cohort study of the National Cancer Institute. Regul. Toxicol.	

No.	Exhibit Description	Bates Range
	Pharmacol. 42, 275-283.	
298.	Marsh, G.M., Youk, A.O., Morfeld, P., 2007a. Mis-specified and non-robust mortality risk models for nasopharyngeal cancer in the National Cancer Institute Formaldehyde Worker Cohort Study. Regulatory Toxicology and Pharmacology 47, 59-67.	
299.	Marsh GM, Youk AO, Buchanich JM, Erdal S, Esmen NA., 2007b. Work in the Metal Industry and Nasopharyngeal Cancer Mortality among Formaldehyde-Exposed Workers. Regulatory Toxicology and Pharmacology 48:308-319.	
300.	Pinkerton, L.E., Hein, M.J., Stayner, L.T., 2004. Mortality among a cohort of garment workers exposed to formaldehyde: an update. Occup. Environ. Med. 61, 193-200.	
301.	Stewart PA, Cubit DA, Blair A, 1987. Formaldehyde exposure levels in seven industries. Applied Industrial Hygiene 2:231-236.	
302.	CV of Damien Serauskas	
303.	CV of Thomas Fribley	
304.	Photographs of Thomas Fribley of Dubuclet unit	Dubuclet-Fribley-1543 through Dubuclet-Fribley-1752
305.	Handwritten notes of Thomas Fribley	Dubuclet-Fribley-1753
306.	Handwritten notes of interview of Elisha and Timia Dubuclet on 7/13/09 and 7/15/09	Exhibit 7 to Deposition of Dr. Edward Shwery taken 8/10/09
307.	Handwritten notes of Dr. Schwery	Exhibit 9 to his deposition taken 8/10/09
308.	Curriculum Vitae of Dr. Edward H. Schwery	PSC025369 through PSC025384
309.	Exhibit 4 to Deposition of Charles David Moore taken August 11, 2009 – identified as bates numbers	FLE-00006608; FLE-00006518, FLE-00006502, FLE-00006519, FLE-00005018-FLE-00005020; FLE-00004089-FLE-00004090; FLE-00004491-

No.	Exhibit Description	Bates Range
		FLE-00004090; FLE-00004491-FLE-00004493; FLE-00004507; FLE-00004511; FLE-00004669-FLE-00004673; FLE-00004680-FLE-00004684; FLE-00004688-FLE-00004690; FLE-00004694-FLE-00004696; FLE-00004701-FLE-00004707; FLE-00004791-FLE-00004794; FLE-00004799-FLE-00004801; FLE-00006901 – FLE-6902;
310.	Flyer distributed by FEMA in summer, 2006	Exhibit 4 to deposition of Guy Bonomo
311.	FEMA Important Formaldehyde Information for FEMA Housing Occupants	Withdrawn duplicates Ex. 335
312.	SP-Formaldehyde PS Post bates stamped FEMA 162-000016	Exhibit 4 to deposition of Stanley Larson
313.	SP-Formaldehyde PS Post bates stamped 162-000388	Exhibit 5 to deposition of Stanley Larson
314.	Declaration of Joseph Little	Withdrawn
315.	Email from Joseph Little to Howard Frumkin	Exhibit 4 to deposition of Joseph Little
316.	Health Consultation, Formaldehyde Sampling of FEMA Temporary Housing Units, Baton Rouge, LA, February 1, 2007	Exhibit 5 to deposition of Joseph Little
317.	Declaration of Martin McNeese	Withdrawn
318.	Email dated 10/11/06 FEMA 17-000380-82	Exhibit 7 to deposition of Martin McNeese
319.	Email dated 3/6/07 FEMA 17-003608	Exhibit 9 to deposition of Martin McNeese
320.	Declaration of David Garratt	Withdrawn
321.	Email dated 5/18/07 DHS S&T 6040-44	Exhibits 5 to deposition of David Garratt
322.	Email dated 5/17/07 FEMA 17-0009030-33	Exhibits 7 to deposition of David Garratt

No.	Exhibit Description	Bates Range
323.	5/18/07 DHS S&T 4856-57	Exhibit 8 to deposition of David Garratt
324.	Email dated 8/18/07 DHS S&T 4060-62	Exhibit 16 to deposition of David Garratt
325.	Memo dated 7/26/06 FEMA – Waxman 23-25	Exhibit 17 to deposition of David Garratt
	FEMA/ U.S. GOVERNMENT	
326.	CDC Summary and Interim Report: "VOC and Aldehyde Emissions in Four FEMA Temporary Housing Units" – Indoor Environment Department, Lawrence Berkeley National Laboratory, May 8, 2008	PSC002113 - PSC002166
327.	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"	PSC002167 - PSC002181
328.	"CDC Interim Findings on Formaldehyde Levels in FEMA-Supplied Travel Trailers, Park Models, and Mobile Homes" – February 29, 2008	PSC002182- PSC002202
329.	CDC Final Report on Formaldehyde Levels in FEMA-Supplied Travel Trailers, Park Models, and Mobile Homes" – July 2, 2008	PSC002203 - PSC002263
330.	Agency for Toxic Substances and Disease Registry (ATSDR) "Health Consultation, Formaldehyde Sampling at FEMA Temporary Housing Units, Baton Rouge, Louisiana, February 1, 2007"	PSC002264 - PSC002277;
331.	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 2007"	PSC002278 - PSC002318
332.	"Formaldehyde Levels in FEMA-Supplied Trailers - Early Findings from the Centers for Disease Control and Prevention"	PSC003218 - PSC003219;
333.	Indoor Air Quality and Health in FEMA Temporary Housing for Trailer Residents prepared by CDC	PSC021583 – PSC021584
334.	"Important Information for Travel Trailer Occupants" FEMA brochure	Withdrawn, duplicate of Ex. 335.

No.	Exhibit Description	Bates Range
335.	FEMA: Important Formaldehyde Information for FEMA Housing Occupants	FEMA08-000015
336.	Martin McNeese email dated 10/11/06	FEMA 17-000029
337.	"Medical Management Guidelines for Formaldehyde" A publication of the Department of Health and Human Services, ATSDR. Updated 2/7/08.	Withdrawn.
338.	FEMA: Formaldehyde in FEMA Family Units Sampling Program, Baton Rouge, LA, Field Documentation, Data Files and Analytical Data DVD, November 13, 2006 (Cited to ATSDR above)	Withdrawn.
339.	ATSDR, Managing Hazardous Materials Incidents, Medical Management Guidelines for Acute Chemical Exposure, Formaldehyde, ATSDR, 2001	Withdrawn.
340.	FEMA: Important Formaldehyde Information for FEMA Housing Occupants	Withdrawn, duplicate of Ex. 335.
341.	Judith Reilly email dated 4/14/06	Withdrawn.
342.	Michael Miller email dated 6/2/06	Withdrawn.
343.	Runge email dates 11/2/07	Withdrawn.
344.	Ryan Buras email dated 5/17/07	Withdrawn.
345.	FEMA Talking Points	Withdrawn.
346.	Martin McNeese email dated 3/5/07	Withdrawn.
347.	Curtis Melnick email dated 5/11/06 (Miller deposition exhibit 22)	Withdrawn.
348.	FEMA 17-010774	Withdrawn.
349.	Internal FEMA emails regarding formaldehyde response	Withdrawn.
350.	Internal FEMA emails regarding OSHA testing and media publicity	Withdrawn.
351.	FEMA 17-009065, 009067	Withdrawn.
352.	FEMA 17-018456	Withdrawn.
353.	FEMA 17-002096	Withdrawn.
354.	FEMA 17-008401	Withdrawn.
355.	Devany Summary of Sierra Club Results	Withdrawn.
356.	Devany memo on bake-off procedures	Withdrawn.
357.	Devany attachment to Becky Gillette letter to David Garratt	Withdrawn.

No.	Exhibit Description	Bates Range
358.	Correspondence from Patrick Logue (Industrial Hygienist) Employee Formaldehyde Exposure Assessment/Raleigh with attached recommended occupational exposure limit for formaldehyde based on irritation (FL-FDA-025835)	Withdrawn.
359.	Formaldehyde Indoors – Use reconstituted wood products with lower emissions Authored by Stephen Smulski, April, 1987	
360.	Toxicological Profile on Formaldehyde prepared by ATSDR on July 1999	

EXHIBIT C TO THE JOINT PRE-TRIAL

UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF LOUISIANA
 NEW ORLEANS DIVISION

IN RE: FEMA TRAILER * MDL NO. 1873
 FORMALDEHYDE *
 PRODUCTS LIABILITY *
 LITIGATION * SECTION: N(5)
 *

This Document Relates to:
Dubuclet v. Fleetwood Enterprises, Inc.
 Case No. 07-9228
 JUDGE: ENGELHARDT

MAG: CHASEZ

JOINT TRIAL PLAN OF THE PARTIES

Date	Activity	Subject-Matter	Mode	PSC	Fleetwood	Floor	Time
	Voir Dire/Seating Jury						2:00:00
	Opening Statement			0:25:00	0:25:00		0:50:00
	Reading of Stipulations.						0:20:00
	Pre Admission of Exhibits						0:20:00

¹ The parties understand that the Court will instruct the parties on the amount of time permitted for these items; the listed times are from the Gulf Stream case.

Date	Activity	Subject-Matter	Mode	PSC	Fleetwood	Fluor	Time
PSC Case							
	Smith, Elden	Fleetwood CEO	Live	0:30:00	0:30:00		1:00:00
	McBride, Danny	Fleetwood	Deposition	0:40:00	0:20:00		1:00:00
	Croxton, James	Fleetwood	Deposition	0:15:00	0:20:00		0:35:00
	Snyder, Albert	Fleetwood	Deposition	0:15:00	0:20:00		0:35:00
	Williams, Patricia PhD	PSCExpert/ Toxicologist	Live	0:35:00	1:00:00		1:35:00
	Farish, William	Fleetwood	Deposition	0:30:00	0:15:00		0:45:00
	Smulski, Stephen, Ph.D	PSC expert/ wood science	Live	0:45:00	0:30:00		1:15:00
	Kaltofen, Marco, PE	PSC Expert/Testing Database	Live	0:20:00	0:20:00		0:40:00
	Ritter, Ervin	PSC Expert/ HVAC and Ventilation	Live	0:15:00	0:30:00		0:45:00
	Schilligo, James	Morgan 30b6	Deposition	0:15:00	0:20:00		0:35:00
	Zieman, Michael	RADCO	Deposition	0:40:00	0:20:00		1:00:00
	Mallet, Alexis	PSC Expert/Trailer Construction	Live	0:35:00	0:30:00		1:05:00
	DeRosa, Christopher Dr.	CDC/ATSDR	Deposition	0:50:00	0:20:00		1:10:00
	Garratt, David	FEMA	Deposition	0:20:00	0:30:00		0:50:00
	Larson, Stanley						
		US/FEMA	Deposition	0:10:00	0:15:00		0:25:00

Date	Activity	Subject-Matter	Mode	PSC	Fleetwood	Fluor	Time
	Scott, William, PE	PSC Expert/Tested Unit	Live	0:10:00	0:20:00		0:30:00
	Hewett, Paul, PhD	PSC Expert/Statistics	Live	0:30:00	0:20:00		0:50:00
	Guay, Jessica	Fleetwood	Deposition	0:20:00	0:15:00		0:35:00
	Smith, Steven	Fleetwood	Deposition	0:30:00	0:15:00		0:45:00
	Representative of Formaldehyde Council						
	Laughery, Kenneth PhD	PSC Expert/Warnings	Live	0:30:00	0:15:00		0:45:00
	Shwery, Edward Dr.	PSC Expert Psychologist	Live	0:20:00	0:15:00		0:35:00
	Miller, Larry Dr.	PSC Expert/	Live	0:35:00	0:30:00		1:05:00
	Dubuclet, Timothy	Brother of Plaintiff	Live	0:45:00	0:40:00		1:25:00
	Picot, Leslie	Grandmother of Plaintiff	Live	0:15:00	0:10:00		0:25:00
	Dubuclet, Elisha	Mother of Plaintiff	Live	0:15:00	0:15:00		0:30:00
	Dubuclet, Timia	Plaintiff	Live	0:45:00	0:30:00		1:15:00
			Live	0:10:00	0:15:00		0:25:00
PSC TOTALS				12:25:00	10:20:00		0:22:45:00
FLEETWOOD							
	James, Robert	Expert Toxicologist	Live	0:15:00	1:00:00		1:15:00
	Dyson, William	Expert Industrial Hygienist	Live	0:15:00	0:40:00		0:55:00

Date	Activity	Subject-Matter	Mode	PSC	Fleetwood	Fluor	Time
	Theobald, Forrest	Fleetwood. Former General Counsel	Live	0:20:00	0:30:00		0:50:00
	Reick, Charles	Fleetwood. Materials/ Purchasing	Deposition	0:20:00	0:30:00		0:50:00
	Sauers, Terri	Continental Lumber. Materials/ Purchasing US/FEMA	Deposition	0:15:00	0:20:00		0:35:00
	McCreary, Bryan	US/FEMA	Deposition	0:15:00	0:15:00		0:30:00
	McNeese, Martin	US/FEMA	Deposition	0:15:00	0:15:00		0:30:00
	Bonomo, Guy	US/FEMA	Deposition	0:15:00	0:15:00		0:30:00
	Souza, Kevin	FEMA	Deposition	0:20:00	0:15:00		0:35:00
	Little, Joseph	CDC/ATSDR	Deposition	0:30:00	0:30:00		1:00:00
	Ginevan, Michael	Expert Biostatistics	Live	0:15:00	0:30:00		0:45:00
	Biazo, Craig	Fleetwood. FEMA contract, customer comments.	Live	0:15:00	0:20:00		0:35:00
	Fribley, Thomas	Expert	Live	0:15:00	0:30:00		0:45:00
	Serauskus, Damien	Expert	Live	0:20:00	0:40:00		1:00:00
	Wozniak, Robert	Fleetwood. Travel Trailer design and construction, customer service issues.	Live	0:25:00	0:45:00		1:10:00
	Cole, Dr. Phillip	Expert	Live	0:15:00	1:15:00		1:30:00

Date	Activity	Subject-Matter	Mode	PSC	Fleetwood	Fluor	Time
	Maibach, Dr. Howard	Expert	Live	0:15:00	1:30:00		1:45:00
	Farris, Dr. Patricia	Expert	Live	0:20:00	0:20:00		0:40:00
	Wedner, Dr. James	Expert	Live	0:15:00	1:00:00		1:15:00
	Closing Arguments ²			0:45:00	0:45:00		1:30:00
FLEETWOOD TOTALS				7:05:00	13:00:00		20:05:00
TOTAL TIME				19:30:00	23:20:00		

² The parties understand that the Court will instruct the parties on the amount of time permitted for these items; the listed times are from the Gulf Stream case.

EXHIBIT D TO THE JOINT PRE-TRIAL ORDER

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

IN RE: FEMA TRAILER FORMALDEHYDE PRODUCTS LIABILITY LITIGATION	*	MDL NO. 1873
	*	
	*	SECTION "N" (5)
	*	
RELATES TO CIVIL ACTION NO. 07-9228 Aldridge, et al. vs. Gulf Stream Coach, Inc., et al. (Elisha Dubuclet obo Timia Dubuclet)	*	JUDGE ENGELHARDT
	*	
	*	MAGISTRATE CHASEZ

PLAINTIFF'S REVISED WITNESS LIST

NOW INTO COURT, through undersigned counsel, come Plaintiff, Elisha Dubuclet, on behalf of her minor child, Timia Dubuclet, pursuant to this Honorable Court's Trial Scheduling Order dated August 17, 2009 (Doc. No. 2717), who hereby submit the following Witness List in connection with the above captioned matter:

	Category:	Witness:	Type of Witness:	May/Will Call:
	Plaintiffs:			
1.		Elisha Dubuclet	Fact	
2.		Timia Dubuclet	Fact	
	Specific to Dubuclet:			
3.		Timothy Dubuclet, Jr. Brother of Timia Dubuclet	Fact	
4.		Leslie Picot Grandmother of Timia Dubuclet	Fact	

	Experts:			
5.		Dr. Lee Branscome, Ph.D., C.C.M.	Expert	
6.		Dr. Paul Hewett, Ph.D.	Expert	
7.		Marco Kaltofen, P.E. (Civil), M.S.	Expert	
8.		Dr. Kenneth Laughery, Ph.D.	Expert	
9.		Alexis Mallet, Jr.	Expert	
10.		Dr. Lawrence Miller, M.D., M.P.H.	Expert	
11.		Charles David Moore, P.E., P.L.S.	Expert	
12.		Ervin Ritter, P.E.	Expert	
13.		William Scott, P.E., C.H.M.M.	Expert	
14.		Dr. Edward Shwery, Ph.D.	Expert	
15.		Dr. Stephen Smulski, Ph.D.	Expert	
16.		Dr. Patricia Williams, Ph.D., D.A.B.T.	Expert	
	Fleetwood, et al.:			
17.		Representative of Fleetwood, et al.	Fact	
18.		Elden Smith Fleetwood, et al. CEO	Fact	
19.		Robert "Bob" Wozniak Fleetwood Travel Trailers of Texas, Inc. Retired Director of Engineering for Recreational Vehicles; Responsible for Placing Warning Labels in travel trailers Manufacturing Plant 40 Production Employee	Fact	

20.		Forrest Theobald Fleetwood Travel Trailers of Texas, Inc. Retired Manufacturing Plant 40 Production Employee General Historical Standpoint	Fact	
21.		Doug Henriquez Fleetwood, et al. Director for Business Development Waco Facilities	Fact	
22.		William C. Farish Fleetwood, et al. Director of Product Engineering for the Housing Group	Fact	
23.		Charlie Reick Fleetwood, et al.	Fact	
24.		Chris Braun Fleetwood, et al. Executive Vice President of the RV Group	Fact	
25.		Danny McBride Fleetwood, et al. Senior Supervisor	Fact	
26.		Jessica Guay Fleetwood, et al. Former Employee	Fact	
27.		James Croxton Fleetwood, et al.	Fact	
28.		Albert Snyder Fleetwood, et al.	Fact	
29.		Steven Smith Fleetwood, et al.	Fact	
	Fluor Enterprises, Inc.:			
30.		Representative of Fluor Enterprises, Inc.	Fact	

31.		Hugo Linares Fluor Enterprises, Inc. Project Service Manager	Fact	
32.		Al Whitaker Fluor Enterprises, Inc. Program Manager	Fact	
33.		Dave Methot Fluor Enterprises, Inc. Contracting Officer's Technical Representative (COTR) Compliance	Fact	
34.		Robert Duckworth Fluor Enterprises, Inc.	Fact	
35.		John B. Reeves Fluor Enterprises, Inc. Subcontractor	Fact	
	Government/ FEMA:			
36.		Dr. Christopher DeRosa Previously Center for Disease Control and Prevention (CDC)	Fact/ Expert	
37.		Commander Joseph Little Emergency Coordinator for the National Institute for Occupational Safety and Health (NIOSH)	Fact	
38.		David E. Garratt FEMA Acting Deputy Administrator	Fact	
39.		Rene Rodriguez FEMA	Fact	
40.		Stephen C. Miller FEMA Disaster Reservist in Region 2	Fact	

41.		Kevin Souza FEMA Enterprise Coordination and Information Management Section Chief, Virginia	Fact	
42.		Michael Lapinski FEMA Federal Coordinating Officer	Fact	
43.		Bryan McCreary FEMA Contracting Officer	Fact	
44.		David Porter FEMA Contracting Officer's Technical Representative (COTR)	Fact	
45.		Martin E. McNeese FEMA Program Officer for FEMA Region 8 in Individual Assistance Programs	Fact	
46.		Guy Bonomo FEMA Direct Housing Operations Chief	Fact	
47.		Stephen Harris FEMA Unit Inspector	Fact	
48.		Stanley Larson FEMA Employee	Fact	
	Morgan Building & Spas, Inc.:			
49.		Representative of Morgan Building and Spa, Inc.	Fact	
50.		James Schilligo Morgan Building Systems Assistant to President of Morgan Building Systems	Fact	

51.		Guy Morgan Morgan Building Systems President and CEO	Fact	
	Vendors/ Suppliers:			
52.		Mark Atkins Representative of Georgia-Pacific Corporation	Fact	
	Other:			
53.		Representative of the Formaldehyde Council	Fact	
54.		Nathan R. Vallette W.D. Scott Group	Fact	
55.		Ronni Troiano W.D. Scott Group	Fact	
56.		D. Scott Johnson Bombet, Cashio & Associates Photographer	Fact	
57.		Michael L. Zieman, P.E. Resources Applications, Designs and Controls, Inc., Listing and Testing Division (RADCO) Vice President	Fact	
58.		Any and all other witnesses who may be identified or discovered on the basis of Defendants' responses to discovery propounded by Plaintiffs or depositions taken during discovery in this matter	Fact/ Expert	
59.		Any and all witnesses listed by any other party in this action	Fact/ Expert	

Plaintiff respectfully reserve the right to call any witness who becomes known during discovery in this matter or is listed by any party. Plaintiff further reserve the right to supplement and amend this list once discovery is complete.

Respectfully submitted:

**FORMALDEHYDE TRAILER FORMALDEHYDE
PRODUCT LIABILITY LITIGATION**

BY: /s/Gerald E. Meunier

GERALD E. MEUNIER, #9471

PLAINTIFFS' CO-LIAISON COUNSEL

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/s/Justin I. Woods

JUSTIN I. WOODS, #24713

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**COURT-APPOINTED PLAINTIFFS'
STEERING COMMITTEE**

ANTHONY BUZBEE, Texas # 24001820

RAUL BENCOMO, #2932

FRANK D'AMICO, #17519

MATT MORELAND, #24567

LINDA NELSON, #9938

MIKAL WATTS, Texas # 20981820

DENNIS REICH, Texas # 16739600

ROBERT BECNEL, #14072

	Former Fleetwood employee (Deposition November 4, 2009)		
FLE5	Douglas Henriquez Former Fleetwood employee and 30(b)(6) witness (Deposition in class cert portion of case date July 16, 2008)	Fact Witness	May Call
FLE6	Jason Leidig Former Fleetwood employee (Deposition date November 3, 2009)	Fact Witness	May Call
FLE7	Danny McBride Former Fleetwood employee (Deposition date November 6, 2009)	Fact witness	May Call
FLE8	Charles Reick Former Fleetwood employee (Deposition date October 6, 2009)	Fact Witness	May Call
FLE9	Terri Sauers Former Continental Lumber employee and 30(b)(6) witness (Deposition class cert portion of case date July 16, 2008)	Fact Witness	May Call
FLE10	James Schilligo Morgan	Fact Witness	May Call
FLE11	Elden Smith Fleetwood employee (Deposition date October 7, 2009)	Fact Witness	Will Call
FLE12	Steven Smith Former Fleetwood employee (Deposition date November 3, 2009)	Fact Witness	May Call
FLE13	Albert Snyder Former Fleetwood employee and 30(b)(6) witness (Deposition date August 18, 2009)	Fact Witness	May Call
FLE14	Forrest Theobald Former Fleetwood employee and 30(b)(6) witness (Deposition date June 25, 2009)	Fact Witness	May Call
FLE15	Robert Wozniak Former Fleetwood employee, 30(b)(6) witness and expert witness (Deposition dates June 25, 2009, August 18, 2009, and October 6, 2009)	Fact Witness and Expert Witness	May Call
FLE16	Michael Zieman RADCO (Deposition date October 6, 2009)	Fact Witness	May Call
FLE17	Philip Cole, M.D. Fleetwood Expert – Epidemiologist	Expert Witness	May Call

	(Deposition date October 27, 2009)		
FLE18	William Dyson Fleetwood Expert – Industrial Hygienist (Deposition date October 27, 2009)	Expert Witness	May Call
FLE19	Dr. Patricia Farris Dermatologist/IME of Timia Dubuclet (Deposition date October 14, 2009)	Expert Witness	May Call
FLE20	Thomas Fribley Fleetwood Expert -- RV construction and design (Deposition date October 21, 2009)	Expert Witness	May Call
FLE21	Michael Ginevan, PhD Fleetwood Expert – Biostatistician (Deposition date November 4, 2009)	Expert Witness	May Call
FLE22	Robert James, Ph.D. Fleetwood Expert - Toxicologist	Expert Witness	Will Call
FLE23	Dr Howard Maibach Fleetwood Expert -- Dermatotoxicologist (Deposition date October 20, 2009)	Expert Witness	Will Call
FLE24	Damien W. Serauskas, P.E. Fleetwood Expert – Technical Items related to indoor air quality and construction (Deposition date October 22, 2009)	Expert Witness	May Call
FLE25	Anthony Watson Fleetwood Expert – Industrial Hygienist (Deposition date October 27, 2009)	Expert Witness	May Call
FLE26	James Wedner, MD, FAAAAI Fleetwood Expert – Allergic and Immunologic Diseases (Deposition date October 12, 2009)	Expert Witness	Will Call
FLE27	Timia Dubuclet Plaintiff	Fact Witness	May Call
FLE28	Elisha Dubuclet Mother of Plaintiff	Fact Witness	May Call
FLE29	Leslie Picot Grandmother of Plaintiff	Fact Witness	May Call
FLE30	Timothy Dubuclet Brother of Plaintiff	Fact Witness	May Call
FLE31	David Garratt FEMA employee (Deposition date July 7, 2009).	Fact Witness	May Call
FLE32	Joseph Little ATSDR Employee (Deposition date June 23, 2009)	Fact Witness	May Call

FLE33	Bryan McCreary FEMA employee (Deposition date September 23, 2008)	Fact Witness	May Call
FLE34	David Porter FEMA Employee (Deposition date July 8, 2009).	Fact Witness	May Call
FLE35	Kevin Souza FEMA Employee (Deposition date September 23, 2008)	Fact Witness	May Call
FLE36	Martin McNeese FEMA Employee (Deposition date July 14, 2009)	Fact Witness	May Call
FLE37	Guy Bonomo FEMA Employee	Fact Witness	May Call
FLE38	Stanley Larson FEMA Employee	Fact Witness	May Call
FLE39	Al Whitaker Fluor Employee (Deposition date August 5, 2009)	Fact Witness	May Call
FLE40	Joseph Fritz FEMA	Fact Witness	May Call
FLE41	Rene Rodriquez FEMA	Fact Witness	May Call
FLE42	Any witness listed on any other party's witness list.		May Call