

March 22, 2011

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BY ECF & U.S. Mail

Hon. Eldon E. Fallon U.S. District Court for the Eastern District of Louisiana 500 Poydras Street Room C456 New Orleans, LA 70130

RE: IN RE: CHINESE MANUFACTURED DRYWALL PRODUCTS LIABILITY LITIGATION; MDL No. 2047; THIS DOCUMENT PERTAINS TO ALL MATTERS

Honorable Judge Fallon:

We represent Defendants Taishan Gypsum Co. Ltd. ("TG") and Tai'an Taishan Plasterboard Co. Ltd. ("TTP") (together, "Defendants") in the above-captioned matter. We have prepared this submission after consulting with Plaintiff's liaison counsel to supplement our letter response dated March 7, 2011 to the Court's order on February 23, 2011 that Defendants provide information relating to their trademarks in accordance with Pre-Trial Order No. 10 and to the Photographic Examples of Chinese Drywall Markings contained on the Court's website at http://www.laed.uscourts.gov/Drywall/Drywall/Drywall/Markings.htm (the "Website").

Defendants have examined the images on the Website and compared them to their records containing information about drywall sold to U.S. dimensions. The attached appendix indicates which images on the Website depict markings that are consistent with those described in Defendants' records. Because photographs of the drywall sold by Defendants in the relevant period are generally unavailable, we cannot comment with certainty as to the origins of most of the drywall pictured on the Website. Furthermore, many of the markings on the Website are ubiquitous and may have been placed on drywall by multiple manufacturers. For example, entry 16 on the website—MADE IN CHINA MEET OR EXCEED ASTM C1396 04 STANDARD—may well represent other manufacturers' markings even where our contracts indicate that Defendants put the same or similar markings on their drywall.

Additionally, we have enclosed a catalog of images of trademarks and markings applicable to Defendants' products, including their drywall. However, our records indicate that these trademarks and markings were rarely applied to the drywall sold to U.S. dimensions to customer specification. In some cases, such trademarks were applied to edge sealing tape, but we understand that was usually removed prior to installation, so it may have limited utility as a means of product verification. Nevertheless, Defendants propose that these images be added to the Website and labeled Taishan Gypsum 1-9 in accordance with Pre-Trial Order No. 10.

Sincerely,

Matthew J. Galvin

cc: Lenny Davis, Esq.

Encl.