

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

**IN RE: CHINESE MANUFACTURED DRYWALL
PRODUCTS LIABILITY LITIGATION
THIS DOCUMENT RELATES TO: ALL CASES**

**MDL NO. 2047
SECTION: L
JUDGE FALLON
MAG. JUDGE WILKINSON**

For Internal Use Only

File Number

Date Received

This Plaintiff Profile Form must be completed and signed by every person making a claim in this litigation using one form per affected address. In completing this Profile Form, you are under oath and must provide information that is true and correct to the best of your knowledge. If you cannot recall all of the details requested, please provide as much information as you can and expressly indicate "unknown" in the space provided when not known. You must supplement your responses if you learn they are incomplete or incorrect in any material respect. You may and should consult with your attorney if you have any questions regarding completion of this form. If you are completing the form for someone who has died or who cannot complete the Profile Form, please answer as completely as you can for that person.

The questions and requests for production contained within this Profile Form are non-objectionable and shall be answered without objection. By answering this Profile Form, you are not waiving the attorney work product and/or attorney client privileges. Similarly, by disclosing the identity of consultants, such consultants may remain non-testifying experts and are subject to all protections afforded by law.

To the extent that the form does not provide enough space to complete your responses, you may attach as many sheets of paper as necessary. All photographs produced in response to this form shall be in color and attached to or printed on 8 1/2" x 11" white paper.

Section I. Property Information			
Name Property Owner	_____		
Address of Affected Property	_____ _____ _____		
Is this Property:*	Residential	Commercial	Governmental
Name of Person Completing this Form	_____		
Is above your primary residence?	Yes	No	
Mailing Address (if different)	_____ _____ _____		
Phone:	()	-	
* If your response is commercial or governmental you should not fill out the remaining questions, you will receive a follow up form at a later date.			
Circle one:	Owner-Occupant	Owner Only	Renter-Occupant
Represented By:	_____		
Address:	_____ _____ _____		
Phone:	()	-	
Case No. /Docket Info:	_____		

Section II. Insurance Information	
Homeowner/ Renter Insurer:	_____
Policy #:	_____
Agent:	_____
Address:	_____ _____ _____
Phone:	() -
+ Attach Copy of Insurance Declaration Page	

Section III. Claimant Information						
Name of Claimant	Dates Occupied		Gender	Date of Birth	Are you claiming personal injuries?*	Identify Claimant Status as an Owner-Occupant, an Owner Only, or an Occupant or Renter Only
	Move-in	Leave				
	/ /	/ /	M / F	/ /	Yes No	
	/ /	/ /	M / F	/ /	Yes No	
	/ /	/ /	M / F	/ /	Yes No	
	/ /	/ /	M / F	/ /	Yes No	
	/ /	/ /	M / F	/ /	Yes No	
	/ /	/ /	M / F	/ /	Yes No	
	/ /	/ /	M / F	/ /	Yes No	
	/ /	/ /	M / F	/ /	Yes No	
	/ /	/ /	M / F	/ /	Yes No	

* Personal injuries include claims for mental anguish and medical monitoring.

Section IV. Inspection Information

1.0. Have you, or has anyone on your behalf, conducted an inspection into whether Chinese-manufactured drywall is present in your home? Yes No

1.1. If "Yes" to Question 1.0 Section IV. Who conducted the inspection? _____

1.2. When did the inspection take place? / /

2.0. Has a determination been made that Chinese-manufactured drywall is present in your home? Yes No

2.1. If "Yes" to Question 2.0. Section IV. Who made this determination? _____

2.2. When was this determination made? / /

Section V. Drywall Information

Drywall Manufacturer	Markings on Drywall	Location in Home

Section VI. Home Information

Approx. Sq. Ft. of House:					
Estimated Sq. Ft. of Drywall		Occupied		Yes	No
Height of interior Walls		Year-round			
Number of Bedrooms:		Summer			
Number of Bathrooms:		Winter			
Plumbing System					
		Blackening or Corrosion?			
		Yes	No	N/A	
PVC/ CPVC/ Plastic Piping					
Copper Piping					
Copper Fixtures					
Other Fixtures					
Were repairs made to the plumbing system?					
Dates:					
Electrical System					
		Blackening or Corrosion?			
		Yes	No	N/A	
Receptacles					
Switches					
Main Panel					
2nd Panel					
Exposed Copper Wires					
Were repairs made to the electrical system?					
Dates:					
+ Attach Copy of Floor Plan on 8 1/2" X 11" paper					

Section VII. Construction/Renovation Information

Date Range for New Home Construction: (Month/Day/Year)					
Start Date:				Completion Date	
Move In Date:				Date Acquired Home	
Date Range for Renovations: (Month/Day/Year)					
Start Date:				Completion Date	
Move In Date:					
Renovation(s)		Yes	No	N/A	
First Floor: 1/2 Wall of drywall replaced					
First Floor: Full Wall of drywall replaced					
Second Floor: Any drywall replaced					

Section VIII. Homebuilder/ General Contractor/ Developer Information

Homebuilder/ General Contractor/ Developer's Name: _____

Address: _____

Phone: () - -

+ Attach Copy of Construction/Renovation Contract
+ Attach Copy of New Home Warranty Declaration

Section IX. Drywall Installer

Drywall Installer's Name: _____

Address: _____

Phone: () - -

Section X. Drywall Supplier

Drywall Supplier's Name: _____

Address: _____

Phone: () - -

Section XI. Verification of Plaintiff Profile Form

I declare under penalty of perjury under the laws of the United States of America and pursuant to 28 U.S.C. § 1746 that all information provided in this Plaintiff Profile Form is true and correct to the best of my knowledge, and that I have supplied all of the documents requested in this declaration to the extent that such documents are in my possession, custody or control.

_____	_____	_____	_____
Claimant's Signature	Date Signed	Claimant's Signature	Date Signed
_____	_____	_____	_____
Claimant's Signature	Date Signed	Claimant's Signature	Date Signed
_____	_____	_____	_____
Claimant's Signature	Date Signed	Claimant's Signature	Date Signed

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA

IN RE: CHINESE MANUFACTURED DRYWALL
PRODUCTS LIABILITY LITIGATION

: MDL No. 2047
: Section L

This Document Relates to
ALL CASES

:
: JUDGE FALLON
: MAG. JUDGE WILKINSON

DEFENDANT MANUFACTURERS' PROFILE FORM

All Defendant Drywall Manufacturers must complete and submit this Defendant Manufacturers' Profile Form. Each Defendant Drywall Manufacturer must complete and sign a Defendant Manufacturers' Profile Form for all shipments or deliveries of Chinese Drywall into, or for importation into, the US from 2001 through 2009. Each Defendant Drywall Manufacturer must complete and sign a separate Exhibit A for any individual named Plaintiff with an action pending in Federal Court. If additional knowledge becomes known after completion, this Defendant Manufacturers' Profile Form must be supplemented. If additional space is needed to answer any questions or complete your responses, additional pages may be attached. In addition, if any attachments or documents are provided in response to any question, please identify the specific question within this Defendant Manufacturers' Profile Form that relates to the specific attachment or document.

The questions contained within this Profile Form are non-objectionable and shall be answered without objection. By answering this Profile Form, you are not waiving the attorney work product and/or attorney client privileges. Similarly, by disclosing the identity of consultants, such consultants may remain non-testifying experts and are subject to all protections afforded by law. Please print legibly or type your responses in English.

I. CONTACT INFORMATION OF DEFENDANT MANUFACTURER COMPLETING THIS PROFILE FORM

- A. Manufacturer Name _____
- B. Address _____
- C. Phone number _____
- D. Email address _____
- E. Web site _____
- F. President or CEO _____
- G. Headquarters if Foreign _____
- H. Address of USA Headquarters _____
- I. Name of supervisor at USA
Headquarters _____
- J. Principal Place of Business in USA _____
- K. List of all offices or locations in USA where entity has done business at any time in 2001 through 2009 _____
- L. Name of Manager at each office or location identified in I(J) above _____

(If you have identified more than one entity in I(A) above separately answer I(B)-I(L) for each entity.)

II. COUNSEL INFORMATION OF DEFENDANT MANUFACTURER

- A. Name: _____
- B. Address: _____
- C. Phone Number: _____
- D. Fax Number: _____
- E. E-Mail: _____

III. CHINESE DRYWALL PRODUCT IDENTIFICATION AND CHAIN OF DISTRIBUTION

1. Product Identification:

Name of Manufacturer(s)' drywall product:

Identify any markings on the drywall product (e.g. lot number, batch number, serial number, color markings, UPC codes, etc.): _____

List all trademarks applicable to the product:

Is the drywall that is the subject of this litigation known or referred to, either by the public or only internally within your company, by any other names, brand names, titles, or designations? Provide a detailed list of all names, brand names, titles, and designations by which this drywall is known:

Is the drywall that is the subject of this litigation manufactured in any other types or versions? Please describe such other types and how they may be identified:

Is the drywall that is the subject of this litigation sold by any other party under its own name? If so, provide a list of all parties selling your drywall under their names, and the brand names under which the drywall is sold:

2. Shipment Information (identify the following for each shipment to, or for importation to, the United States):

Exporter Name: _____

Address of Exporter: _____

Date of Export: ____/____/____ (Month / Day / Year)

Name of all ports through which shipment was in transit: _____

Name of final port where shipment was offloaded: _____

Date shipment was offloaded: ____/____/____ (Month / Day / Year)

Amount of Drywall exported: _____

Name of shipper: _____

Address of shipper: _____

Mode of Shipment: _____

Name of vessel: _____

3. Importer Information (identify the following for each importer):

Importer Name: _____

Address of Importer: _____

Date of Import: ____/____/____ (Month / Day / Year)

Amount of Drywall imported: _____

4. Distributor in USA:

To the extent you are aware of the distributor or drywall contractor/installer, for any shipments of your product to the USA, provide such information: _____

5. Are you are of any brokers or intermediary agents involved in the supply chain who purchased or took possession of your product, either directly from you or from a successor in distribution? If so, identify such brokers or intermediary agents by name, address, and phone number, and provide any correspondence or other documentation in your possession concerning such brokers or agents.

6. If any of your Chinese drywall was stored at any time by or for you at any location, identify the following:

Name of entity providing storage: _____

Address of entity providing storage: _____

Dates product was stored:

____/____/____ (Month / Day / Year) to ____/____/____ (Month / Day / Year)

Quantity of product stored: _____

Price paid for storage: _____

Name of contact person at storage facility: _____

Phone number: _____

Email address: _____

List any complaints made or received regarding storage of the product:

- 7. Describe all agreements existing between the manufacturer and: exporters; importers; shippers; and distributors, relating to each shipment of Chinese drywall to, or for importation to, the United States.
- 8. For all shipments or deliveries of Chinese Drywall into, or for importation into, the US from 2001-2009, please indicate whether you provided any of the following
 - a. Express warranties;
 - b. Product specifications;
 - c. Product information and/or instructions for storage or use

IV. **INSURANCE**

A. Identify all policies of insurance, including all CGL, Product Liability, Builder's Risk, D&O and Excess insurance policies relating to claims.

1. For each policy, identify the following:

Insurer: _____

Dates policy in effect:

____/____/____ (Month / Day / Year) to ____/____/____ (Month / Day /

Year)

Policy Number: _____

Type of Policy: _____

Insurance Agent _____

Policy Coverage Limits _____

Produce a copy of the Declaration page, exclusions and policy of insurance.

B. Identify all claims you have made on any insurance policies relating to the manufacture or shipment of products identified in Section V above.

1. For each claim please provide the following:

Date: ____/____/____ (Month / Day / Year)

Insurer: _____

Description of claim: _____

Insurer's response to claim: _____

If in litigation:

Caption of Case: _____

Name and address of attorneys involved: _____

Insurance carriers

involved: _____

CERTIFICATION

I declare under penalty of perjury under the laws of the United States of America and pursuant to 28 U.S.C. § 1746 that all information provided in this Defendant Manufacturers' Profile Form is true and correct to the best of my knowledge, and that I have supplied all of the documents requested in this declaration, to the extent that such documents are in my possession, custody or control.

Signature

Print Name

Date

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA

IN RE: CHINESE MANUFACTURED DRYWALL
PRODUCTS LIABILITY LITIGATION

: MDL No. 2047
: Section L

This Document Relates to
ALL CASES

:
: JUDGE FALLON
: MAG. JUDGE WILKINSON

EXHIBIT A
DEFENDANT MANUFACTURER PROPERTY SPECIFIC DISCLOSURE FORM

Each Defendant Drywall Manufacturer must complete and sign a separate Exhibit A for any individual named Plaintiff with an action pending in Federal Court. If additional knowledge becomes known after completion, this Defendant Manufacturers' Profile Form must be supplemented. If additional space is needed to answer any questions or complete your responses, additional pages may be attached. In addition, if any attachments or documents are provided in response to any question, please identify the specific question within this Exhibit A that relates to the specific attachment or document.

The questions contained within this Exhibit A are non-objectionable and shall be answered without objection. By answering this Exhibit A, you are not waiving the attorney work product and/or attorney client privileges. Similarly, by disclosing the identity of consultants, such consultants may remain non-testifying experts and are subject to all protections afforded by law. Please print legibly or type your responses in English.

I. **INFORMATION ON PLAINTIFF PROPERTY OWNER, RENTER OR OCCUPANT**
(to be provided by Plaintiff)

- A. Name _____
- B. Address of Affected Property: _____
- C. Case Docket No. _____

II. **INFORMATION ON SPECIFIC PROPERTIES**

- A. For each property identified in Section III above, answer the following:
1. Do you have any contracts or agreements concerning Drywall contained in the Property? Yes ____ No ____
 2. Did you issue any warranties for the product installed in the property?
Yes ____ No ____ Don't know _____

3. Have you had any correspondence or other communication concerning Drywall or any construction or remediation at the property? Yes _____ No _____

If yes, provide the following information:

Who was the correspondence or communications by, between or among?

4. Have you performed any inspection(s), testing or analysis of the property?

Yes _____ No _____

If yes, provide the following information:

Who performed the inspection, testing or analysis?

When was the inspection, testing or analysis performed?

Did the testing confirm the presence of Chinese Drywall in this property?

Yes _____ No _____

Were you able to determine any of the following information for the subject property:

a. Manufacturer(s) of the Chinese Drywall

b. Importer/Distributor into the US

c. Builder/Developer

d. Installer/Contractor

As a result of the inspection, were you able to make a determination of the amount and/or percentage of Chinese drywall contained in the subject property?

Yes _____ No _____

If yes, what amount or percentage of Chinese Drywall was found?

5. Has any sampling of drywall been performed of the property?

Yes _____ No _____

If yes, provide the following information:

Name and address of entity that performed the sampling:

6. Have any statements been taken in connection with property or claim?

Yes _____ No _____

If yes, provide the following information:

Who provided the statement?

7. Have any communications or correspondence regarding the property taken place with any drywall contractor / installer, builder, distributor in the USA, importer to the USA, exporter from China or manufacturers of drywall?

Yes _____ No _____

If yes, provide the following information:

Who was the correspondence or communication by, between or among?

8. Have you had any communication concerning the subject property regarding the presence of Chinese Drywall with any foreign or domestic governmental agency or representative?_Yes _____ No _____

If yes, provide the following information:

Who was the communication by, between or among?

9. Have you received a request from anyone to repair the subject property?

Yes____ No_____

If so, from whom did you receive the request?

-

CERTIFICATION

I declare under penalty of perjury under the laws of the United States of America and pursuant to 28 U.S.C. § 1746 that all information provided in this Defendant Manufacturers' Profile Form is true and correct to the best of my knowledge, and that I have supplied all of the documents requested in this declaration, to the extent that such documents are in my possession, custody or control.

Signature

Print Name

Date

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA

IN RE: CHINESE MANUFACTURED DRYWALL
PRODUCTS LIABILITY LITIGATION

: MDL No. 2047
: Section L

This Document Relates to
ALL CASES

:
: JUDGE FALLON
: MAG. JUDGE WILKINSON

CONTRACTOR/INSTALLER DEFENDANT PROFILE FORM

All Contractor/Installer Defendants must complete and submit this Contractor/Installer Defendant Profile Form. Each Contractor/Installer Defendant must sign and date a separate Contractor/Installer Defendant Profile Form for each property owned, rented or occupied by persons who are named plaintiffs in suits pending in the MDL. If additional knowledge becomes known after completion, this Contractor/Installer Defendant Profile Form must be supplemented. If additional space is needed to answer any questions or complete your responses, additional pages may be attached. In addition, if any attachments or documents are provided in response to any question, please identify the specific question within this Contractor/Installer Defendant Profile Form that relates to the specific attachment or document. Please print legibly or type your responses in English.

I. **CONTACT INFORMATION OF CONTRACTOR/INSTALLER DEFENDANT
COMPLETING THIS PROFILE FORM**

- A. Contractor/Installer Name _____
- B. Address _____
- C. Phone number _____
- D. Email _____
- E. President or CEO _____
- F. Headquarters if Foreign _____
- G. Address of USA Headquarters _____
- H. Principal Place of Business in USA _____

(If you have identified more than one entity in IA above separately answer 1B-1H for each entity.)

II. **COUNSEL INFORMATION OF CONTRACTOR/INSTALLER DEFENDANT**

- A. Name: _____
- B. Address: _____
- C. Phone Number: _____
- D. Fax Number: _____
- E. E-Mail: _____

III. **INFORMATION ON PLAINTIFF PROPERTY OWNER, RENTER OR OCCUPANT**

- A. Name _____

B. Address of Affected Property: _____

C. Case Docket No. _____

IV. **INFORMATION ON SPECIFIC PROPERTIES**

A. For each property identified in Section III above that you have performed an inspection on or have information concerning, answer the following:

1. Do you have any contracts or agreements concerning Drywall with the Property owner, renter or occupant? Yes ____ No ____

If yes, provide the following information:

Parties to the agreement: _____

Date of contract or agreement: ____/____/____ (Month / Day / Year)

Subject of contract or agreement: _____

Provide a complete copy of the contract or agreement.

2. Did you issue any warranties for the product installed in the property?

Yes ____ No ____

Please provide a complete copy of any warranty.

3. Are you aware of any warranties provided by any subcontractors or installers concerning the drywall installed on the property? If yes, describe the terms of the warranty.

Provide a copy of any such warranty.

4. Have you had any correspondence or other communication with the Property owner, renter or occupant or any family member concerning Drywall or any construction or remediation matter? Yes _____ No _____

If yes, provide the following information:

All dates of correspondence or communications:

____/____/____ (Month / Day / Year)

____/____/____ (Month / Day / Year)

____/____/____ (Month / Day / Year)

Who was the correspondence or communications by, between or among?

—

What was the substance of the correspondence or communications?

Attach copies of the correspondence or communications.

5. Have you performed any inspection(s), testing or analysis of the property?

Yes _____ No _____

If yes, provide the following information:

Date of inspection, testing or analysis: ____/____/____ (Month / Day / Year)

Who performed the inspection, testing or analysis? _____

Description of what was inspected, tested or analyzed: _____

Attach copies of the complete inspection, test or analysis report.

Were any photographs taken? Yes _____ No _____ How many? _____

Attach copies of all photographs.

What was the reason for the inspection, testing or analysis? _____

Had there been any complaints about this property leading to the inspection, testing or analysis? _____

—

6. Has any sampling of drywall been performed of the property? Yes _____ No _____

If yes, provide the following information:

Date of sampling: ____/____/____ (Month / Day / Year)

Name and address of entity that performed the sampling:

—

Describe sample provided for testing, including approximate size:

Specific location within property from which sample was taken:

Purpose for which samples were taken (e.g., specific tests that were to be performed):

Describe all tests performed on the samples, including who performed the tests:

Attach complete copies of all sampling reports.

7. Have any statements been taken in connection with property or claim?

Yes _____ No _____

If yes, provide the following information:

Date of statement: ____/____/____ (Month / Day / Year)

Who provided the statement?

Was it recorded? Yes _____ No _____

In what form was the statement provided? Written _____ Verbal _____

Who was the statement provided to?

Who did the person work for that took the statement? _____

What was the substance of the statement?

Attach complete copies of all statements.

8. Have any communications or correspondence regarding the property taken place with any drywall contractor / installer, builder, distributor in the USA, importer to the USA, exporter from China or manufacturers of drywall? Yes _____ No _____

If yes, provide the following information:

Date of correspondence or communication: ____/____/____ (Month / Day / Year)

Who was the correspondence or communication by, between or among?

What was the substance of the correspondence or communication?

Attach all copies of the correspondence or communication, or report from the communication.

9. Have you received any communication concerning the subject property regarding the presence of Chinese Drywall?_

Attach copies of all communications.

10. Have you received a request from anyone to repair the subject property? Yes ____
No ____

If so, from whom did you receive the request?_

-
11. Have you retained, employed or associated any experts or investigators to evaluate problems associated with Chinese Drywall? Yes ____ No ____

If yes, please provide the following information:

Name _____

Address: _____

Phone Number: _____

Fax Number: _____

E-Mail: _____

Cell Phone: _____

Date retained: ____/____/____ (Month / Day / Year)

Purpose for which retained:

Area of expertise:

Have any reports or findings been issued? Yes ____ No ____

If so, please provide complete copies of any such reports or findings.

Please provide a copy of any Curriculum Vitae for each individual identified.

V. **INSTALLATION OF DRYWALL AT THE SPECIFIC PROPERTIES**

- B. For each property identified in Section III above that you installed or acted as a contractor for the installation of Drywall, answer the following:

1. Did you have any contracts or agreements concerning Drywall installation with the Property owner, renter or occupant? Yes ____ No ____

If yes, provide the following information:

Parties to the agreement: _____

Date of contract or agreement: ____/____/____ (Month / Day / Year)

Provide a complete copy of the contract or agreement.

2. Provide the name and address of each individual employee that installed Drywall at the property: _____
—

3. Provide the name and address of any subcontractors or installers who were involved in the selection and/or installation of all drywall located on the property: _____

4. Are you aware of any complaints or other problems with the subject drywall, whether raised by your employees, the installers, finishers, homeowners, or anyone else, concerning the drywall installed in the subject premises? If so, please state the exact nature of such complaints or problems:

Attach all documents describing such complaints or problems.

5. Was any action taken to remedy such complaints or other problems? Describe all such actions.

Attach all documents describing such actions taken.

VI. **CHINESE DRYWALL PRODUCT IDENTIFICATION AND CHAIN OF DISTRIBUTION**

1. For all Drywall installed in the subject property, identify:

a. Name of Chinese Drywall
Manufacturer: _____

b. Address of Chinese Drywall
Manufacturer: _____

c. Name of Drywall
product: _____

d. Identify any markings on the Chinese Drywall product (e.g., lot number, batch number, serial number, color markings, UPC codes, etc.): _____

e. List all trademarks of the
product: _____

f. The name and address of the supplier of the
Drywall: _____

g. Date you purchased the Drywall from the
supplier: _____

- h. Amount of Drywall installed in the property:_____
- i. Price you paid for the Drywall installed in the property:_____

Provide documents relating to all of the above.

- 2. Are you aware of the identity of any other entity in the supply chain for the Chinese Drywall used in the subject property? Yes____ No____
If so, whom?

- 2. Prior to installation of the drywall in the property identified in Section IV above:
 - a. Where was the product stored?_____
 - b. Dates of storage? From ___/___/_____(Month/Day/Year) to ___/___/_____(Month/Day/Year)
 - c. Were any complaints made or received regarding storage of the product? Yes____No____

Provide copies of all documentation.

VII.

PROPERTY –

DRYWALL REPAIR OR REPLACEMENT

- A. Have you taken any measures to repair, replace, or remediate any drywall at the property which is the subject of this Contractor/Installer Defendant Profile Form? Yes____ No____
If yes, please provide the following information:
Date ___/___/_____(Month / Day / Year)
- B. Have you repaired or replaced any appliances (air conditioners, hot water heaters, refrigerators, stoves, etc.) at the subject property? Yes____ No____
If yes, please provide the following information:
Date: ___/___/_____(Month / Day / Year)
- C. Have you repaired or replaced any electronics (televisions, microwaves, ovens, computers, etc.) at the subject property? Yes____ No____
If yes, please provide the following information:
Date: ___/___/_____(Month / Day / Year)
- D. Have you repaired or replaced any fixtures (faucets, toilets, etc.) at the subject property? Yes____ No____
If yes, please provide the following information:
Date: ___/___/_____(Month / Day / Year)
- E. Have you repaired or replaced any personal items at the subject property? Yes____ No____
If yes, please provide the following information:

Date: ___/___/_____ (Month / Day / Year)

- F. Have you made any offers to repair any of the property described in Section VI(A) thru (E) above?
Yes_____ No_____

Provide copies of all documentation.

VIII. **INSURANCE**

- A. Identify all of your CGL, Product Liability, Builder's Risk, D&O and Excess insurance policies from 2001 -2009:

For each policy, identify the following:

Insurer: _____

Dates policy in effect: ___/___/___ (Month / Day / Year) to ___/___/___ (Month / Day /
Year)

Policy Number: _____

Type of Policy: _____

Insurance Agent _____

Policy Coverage Limits _____

Produce a copy of the Declaration page, exclusions and policy of insurance.

- B. Identify all insurance claims you have made to any insurer related to Chinese Drywall from 2001-2009:

For each claim please provide the following:

Date: ___/___/_____ (Month / Day / Year)

Insurer: _____

Nature of claim: _____

Insurer's response to claim: _____

Final resolution of claim: _____

Please provide copies of any claims.

- C. Identify all notices provided to insurers, reservation of rights responses and other replies received in response to any communication made with an insurer.

Please provide copies of any documentation supporting the above.

CERTIFICATION

I declare under penalty of perjury under the laws of the United States of America and pursuant to 28 U.S.C. § 1746 that all information provided in this Defendant Contractor/Installer's Profile Form is true and correct to the best of my knowledge, and that I have supplied all of the documents requested in this declaration, to the extent that such documents are in my possession, custody or control.

Signature

Print Name

Date

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA

IN RE: CHINESE MANUFACTURED DRYWALL
PRODUCTS LIABILITY LITIGATION

: MDL No. 2047
: Section L

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: MAG. JUDGE WILKINSON

BUILDER DEFENDANT PROFILE FORM

All Builder Defendants must complete and submit this Builder Defendant Profile Form. Each Builder Defendant must sign and date a separate Builder Defendant Profile Form for each property owned, rented or occupied by persons who are named plaintiffs in suits pending in the MDL. You must supplement your response if you learn they are incomplete or incorrect in any material respect. If additional space is needed to answer any questions or complete your responses, additional pages may be attached.

The questions contained within this Profile Form are non-objectionable and shall be answered without objection. By answering this Profile Form, you are not waiving the attorney work product and/or attorney client privileges. Similarly, by disclosing the identity of consultants, such consultants may remain non-testifying experts and are subject to all protections afforded by law. In addition, if any attachments or documents are provided in response to any question, please identify the specific question within this Builder Defendant Profile Form that relates to the specific attachment or document. Please print legibly or type your responses in English.

I. **CONTACT INFORMATION OF BUILDER DEFENDANT COMPLETING THIS PROFILE FORM**

- A. Builder Name _____
- B. Address _____
- C. Web site _____
- D. Headquarters if Foreign _____
- E. Address of USA Headquarters _____
- F. Principal Place of Business in USA _____

(If you have identified more than one entity in I(A) above, separately answer 1(B)-1(F) for each entity.)

II. **COUNSEL INFORMATION OF BUILDER DEFENDANT**

- A. Name: _____
- B. Address: _____
- C. Phone Number: _____
- D. Fax Number: _____
- E. E-Mail: _____

III. **INFORMATION ON PLAINTIFF PROPERTY OWNER, RENTER OR OCCUPANT**

- A. Name _____
- B. Address of Affected Property: _____

C. Case Docket No. _____

IV. **INFORMATION ON SPECIFIC PROPERTIES**

A. For each property identified in Section III above that you have performed an inspection or have information concerning, answer the following:

1. Have you performed any inspection(s), testing or analysis of the property?

Yes _____ No _____

If yes, provide the following information:

Date of inspection, testing or analysis: ____/____/____ (Month / Day / Year)

Who performed the inspection, testing or analysis?

Description of what was inspected, tested or analyzed: _____

Were any photographs taken? Yes _____ No _____

What was the reason for the inspection, testing or analysis? _____

Had there been any complaints about this property leading to the inspection, testing or analysis? _____

Did the inspection, testing or analysis confirm the presence of Chinese Drywall in this property?

Yes ____ No ____

Were you able to determine any of the following information for the subject property:

a. Manufacturer(s) of the Chinese Drywall

b. Importer/Distributor into the US

c. Builder/Developer

d. Installer/Contractor

As a result of the inspection, testing or analysis, were you able to make a determination of the amount and/or percentage of Chinese drywall contained in the subject property?

Yes ____ No ____

If yes, what amount or percentage of Chinese Drywall was found?

2. Have any samples of the drywall been taken from the property?

Yes _____ No _____

If yes, provide the following information:

Name and address of entity that performed the sampling:

3. Have any statements been taken in connection with the property or claim?

Yes _____ No _____

If yes, provide the following information:

Who provided the statement?

4. Have any communications or correspondence regarding drywall/A/C coils/odor or wiring issues at the property taken place with any drywall contractor / installer, builder, distributor in the USA, importer to the USA, exporter from China or manufacturers of drywall? Yes _____ No _____

If yes, provide the following information:

Who was the correspondence or communication by, between or among?

5. Have you received a request from anyone to repair the subject property?

Yes _____ No _____

If so, from whom did you receive the request?_

V. **CHINESE DRYWALL PRODUCT IDENTIFICATION AND CHAIN OF DISTRIBUTION**

With respect to any Chinese Drywall within the defined property identify the following if known:

A. Name of Chinese Drywall manufacturer:

B. Address of Chinese Drywall manufacturer: _____

C. Who installed the Chinese Drywall at the subject property?

D. Address of installer _____

E. Name and address from whom the installer purchased the Chinese Drywall?

F. Are you aware of the identity of any other entity in the supply chain for the Chinese Drywall used in the subject property? Yes _____ No _____

If so, whom?

G. Prior to installation of the drywall in the property identified in Section IV above:

1. Where was the product stored? _____
2. Dates of storage? From ___/___/_____(Month/Day/Year) to ___/___/_____(Month/Day/Year)
3. Were any complaints made or received regarding storage of the product? Yes _____ No _____

VI. **PROPERTY – DRYWALL REPAIR OR REPLACEMENT**

A. Have you taken any measures to repair, replace, or remediate any drywall at the property which is the subject of this Builder Defendant Profile Form? Yes _____ No _____

If yes, please provide the following information:

Date ___/___/_____(Month / Day / Year)

B. Have you repaired or replaced any appliances (air conditioners, hot water heaters, refrigerators, stoves, etc.) at the subject property? Yes _____ No _____

If yes, please provide the following information:

Date: ___/___/_____(Month / Day / Year)

C. Have you repaired or replaced any electronics (televisions, microwaves, ovens, computers, etc.) at the subject property? Yes _____ No _____

If yes, please provide the following information:

Date: ___/___/_____(Month / Day / Year)

D. Have you repaired or replaced any fixtures (faucets, toilets, etc.) at the subject property? Yes _____ No _____

If yes, please provide the following information:

Date: ___/___/_____(Month / Day / Year)

E. Have you repaired or replaced any personal items at the subject property? Yes _____ No _____

If yes, please provide the following information:

Date: ___/___/_____(Month / Day / Year)

F. Have you made any offers to repair any of the property described in Section VI(A) thru (E) above? Yes _____ No _____

G. Have you retained the services of any third parties to take any intermediate steps intended to remediate the drywall, including by “sealing” the drywall, “neutralizing” the drywall, or through any other means intended to prevent further damage or corrosion caused by the

defective drywall? If so, please identify all such individuals, companies, or entities; explain such efforts; and provide copies of any documents describing such steps and any contracts between you and such third parties.

VII.
CE

INSURAN

- A. Identify all of your CGL, Product Liability, Builder's Risk, D&O and Excess insurance policies from 2001 -2009:

For each policy, identify the following:

Insurer: _____

Dates policy in effect: ___/___/___ (Month / Day / Year) to ___/___/___ (Month / Day / Year)

Policy Number: _____

Type of Policy: _____

Insurance Agent _____

Policy Coverage Limits _____

Produce a copy of the Declaration page, exclusions and policy of insurance.

- B. Identify all insurance claims you have made to any insurer related to Chinese Drywall from 2001-2009:

For each claim please provide the following:

Date: ___/___/_____ (Month / Day / Year)

Insurer: _____

Nature of claim: _____

Insurer's response to claim: _____

Final resolution of claim: _____

- C. Identify all notices provided to insurers, reservation of rights responses and other replies received in response to any communication made with an insurer.

CERTIFICATION

I declare under penalty of perjury under the laws of the United States of America and pursuant to 28 U.S.C. § 1746 that all information provided in this Defendant Builder's Profile Form is true and correct to the best of my knowledge, and that I have supplied all of the documents requested in this declaration to the extent that such documents are in my possession, custody or control.

Signature

Print Name

Date

#211880