

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

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

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

**JUDGE ENGELHARDT  
MAG. JUDGE CHASEZ**

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

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**PLAINTIFF'S EXHIBIT LIST**

NOW INTO COURT, through undersigned counsel, comes Plaintiff, Lyndon Wright, pursuant to this Honorable Court's August 2009 Trial Scheduling Order, who hereby submits the following Exhibit List in connection with the above-captioned matter, to be supplemented by ongoing production, depositions and discovery:

<b>Exhibit ID</b>	<b>Category:</b>	<b>Exhibit Description:</b>	<b>Bates Range:</b>
<b>Plaintiff's Exhibits</b>			
	<b>Governmental Agency Reports and Studies</b>		
1.		CDC Summary and Interim Report: VOC and Aldehyde Emissions in Four FEMA Temporary Housing Unites – Indoor Environment Department, Lawrence Berkeley National Laboratory, 8 May, 2008	PSC002113 – PSC002166
2.		U.S. Department of Health and Human	PSC002167 –

		Services and CDC Presentation Titled “Formaldehyde Levels in Occupied FEMA-supplied Temporary Housing Units (THUs) in LA and MS, Winter 2007-2008”	PSC002181
3.		CDC Interim findings on Formaldehyde Levels in FEMA-Supplied Travel Trailers, Park Models, and Mobile Homes-February 29, 2008	PSC002182 – PSC002202
4.		Agency for Toxic Substances and Disease Registry (ATSDR) “Health Consultations, Formaldehyde Sampling at FEMA Temporary Housing Units, Baton Rouge, Louisiana, February 1, 2007	PSC002264 – PSC002277
5.		ATSDR October 2007 “An Update and Revision of ATSDR’s February 2007 Health Consultation: Formaldehyde Sampling of FEMA Temporary-Housing Trailers Baton Rouge, Louisiana, September –October 2006”	PSC002278 – PSC002318
6.		Statement of Harvey E. Johnson, Jr., Acting Deputy Administrator and Chief Operating Officer for FEMA before the U.S. Senate Subcommittee on State, Local, and Private Sector Preparedness and Integration, March 4, 2008	PSC003188 – PSC003198
7.		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
8.		“Formaldehyde Exposure in Homes: A Reference for State Officials to Use in Decision-Making” published in March 2008 by the DHHS, CDC, DHS, FEMA and the EPA	PSC003208 – PSC003213
9.		U.S. EPA “Indoor Air Quality” Basic Information for Formaldehyde-Last updated November 14, 2007	PSC003214 – PSC003217
10.		“Formaldehyde Levels in FEMA-Supplied Trailers-Early Findings from the Centers for Disease Control and Prevention”	PSC003218 – PSC003219
11.		ASTM Standard Test Method for	PSC021571 –

		Determining Formaldehyde concentrations in Air and Emission Rates in Wood Products Using a Large Chamber (2002)	PSC021582
12.		Indoor Air Quality and Health in FEMA Temporary Housing for Trailer Residents prepared by CDC	PSC021583 – PSC021584
13.		Trailer Manufacturers and Elevated Formaldehyde Levels Majority Staff Analysis, Committee on Oversight and government Reform, U.S. House of Representatives dated on July 9, 2008	PSC024251 – PSC024277
14.		ASHRAE Handbook, 2007: HVAC Applications, Chapter One: Residences	DUB002101 – DUB002107
15.		Department of Homeland Security, Office of Inspector General: FEMA’s Response to Formaldehyde in Trailers dated June, 2009	PSC025938 – PSC026022
16.		Majority Staff Report Subcommittee on Investigations & Oversight – Committee on Science & Technology U.S. House of Representatives, September 2008, “Toxic Trailers-Toxic Lethargy: How the Centers for Disease Control and Prevention Has Failed to Protect the Public Health”	PSC002070 – PSC002112
17.		CDC Interim on CDC Study for Formaldehyde	LWFR-EXP11-000956- LWFR-EXP11-000976
18.		CDC Final Reports on CDC Study for Formaldehyde	LWFR-EXP11-000889- LWFR-EXP11-000949
19.		Lawrence Berkeley Nation Labs report on VOCs in Four Trailers	LWFR-EXP11-001569- LWFR-EXP11-001629
20.		ATSDR Toxicological Profile for Formaldehyde	LWFR-EXP11-000294- LWFR-EXP11-000761
21.		IARC Monographs 2004/2009	To be supplemented
22.		ASTDR, <i>Minimal Risk Levels (MRLs) for Hazardous Substances</i> , 2007 <a href="http://www.astdr.cdc.gov/mrls/index.htm">http://www.astdr.cdc.gov/mrls/index.htm</a> <u>1</u>	To be supplemented
23.		CDC THU Formaldehyde Test Protocol	LWFR-EXP 11-000977 – LWFR-EXP 11-001012
24.		NIOSH, EPA, OSHA, etc. re: Formaldehyde levels	To be supplemented
25.		CDC, <i>Final Report on Formaldehyde</i>	LWFR-EXP 11-00889 –

		<i>Levels in FEMA-Supplied Travel Trailers, Park Models, and Mobile Homes; Conclusions</i> ; 2008, <a href="http://www.cdc.gov/nceh/ehhe/trailerstudy/residents.htm">http://www.cdc.gov/nceh/ehhe/trailerstudy/residents.htm</a>	LWFR-EXP 11-00949
	<b>Standards, Regulations, and Statutes</b>		
25.		24 C.F.R. § 3280.309, Health Notice on formaldehyde emissions Current through November 6, 2008	PSC003147
26.		24 C.F.R. Parts 3280 and 3285	LWFR-EXP5-000457- LWFR-EXP5-000459
27.		§3280.309 – 24 CFR Ch. XX, Health Notice on Formaldehyde emissions (4-1-07)	PSC021693 – PSC021694
28.		ATSDR Formaldehyde Minimal Risk Levels and Worksheets – Appendix A	PSC003158 – PSC003172
29.		U.S. Department of Housing and Urban Development Rules and Regulations regarding Formaldehyde, 49 FR 31996	PSC003173 – PSC003186
30.		California air Resources Board’s (CARB) Standards	PSC021695 – PSC021753
31.		Occupational Safety and Health Administration’s (OSHA) Standards for Formaldehyde	PSC021754 – PSC021772
32.		American Conference of Governmental Industrial Hygienists’ (ACGIH) Standards for Formaldehyde	To be supplemented
33.		National Institute of Occupational Safety and Health’s (NIOSH) Standards for Formaldehyde	PSC024278 – PSC024358
34.		NIOSH Pocket Guide	LWFR-EXP3-000257
35.		Housing and Urban Development’s (HUD) Standards for Formaldehyde (including but not limited to 24 C.F.R. § 3280.308)	To be supplemented
36.		World Health Organization (WHO) and Health Canada’s Standards for Formaldehyde	PSC024359 – PSC024361
37.		American National Standard (ANSI) for Medium Density Fiberboard dated February 4, 1994	PSC021773 – PSC021784
38.		American National Standard (ANSI) for	PSC021785 –

		Particleboard dated February 8, 1999	PSC021797
39.		ANSI A119.2, NFPA 1192: Standard on Recreational Vehicles; 2002 Edition	DUB002054 – DUB002100
40.		ANSI A119.4, NFPA 1194: Standard on Recreational Vehicle Parks and Campgrounds; 2002 Edition	PSC021798 – PSC021817
41.		ANSI/HPVA HP-1; American National Standard for Hardwood and Decorative Plywood	To be supplemented
42.		Toxicological Profile on Formaldehyde prepared by ATSDR on July 1999	PSC024362 – PSC024829
43.		Codes and Standards for Recreational Vehicles ANSI 119.2, NFPA 1192.	Including, but not limited to LWFR-EXP5-000460- LWFR-EXP5-000461
44.		Any and all standards adopted and/or in use from 2005 to present by the Recreational Vehicle Industry Association (RVIA)	To be supplemented
45.		RVIA Standards	LWFR-EXP5-000460- LWFR-EXP5-000461
46.		Building Code of the City of New Orleans, Louisiana	To be supplemented
47.		2006 International Building Code (excerpts)	LWFR-EXP5-000579- LWFR-EXP5-000583
48.		2006 International Residential Code	LWFR-EXP5-000584- LWFR-EXP5-000589
49.		ASCE 7	To be supplemented
50.		ASTM A-36	To be supplemented
51.		FEMA Model Travel Trailer Procurement Specifications	To be supplemented
52.		Clean Air Act Extension of 1970	To be supplemented
53.		Clean Air Act Amendments of 1990	To be supplemented
54.		Dometic Brochure	LWSR-EXP10-001334- LWSR-EXP10-001350
55.		New Source Performance Standards (NSPS)	To be supplemented
56.		National Emissions Standards for Hazardous Air Pollutants (NESHAP)	To be supplemented
57.		National Ambient Air Quality Standards (NAAQS)	To be supplemented
58.		OSHA Formaldehyde Standards	To be supplemented
59.		World Health Organization, 2000, Air Quality Guidelines for Europe; General Public	To be supplemented

60.		Suburban Manufacturing Corporation's Manufacturer's Instructions	To be supplemented
61.		September 1, 2005, Memo from Doug Gaeddert to Mike Farrell at NACS	To be supplemented
62.		National Electrical Code; Article 551	To be supplemented
63.		NIOSH Pocket Guide to Chemical Hazards, 2005	LWFR-EXP3-000257
64.		Excerpts from 2005 Hardwood Plywood Veneer Association "Where to Buy" pp. 78-84	To be supplemented
65.		Construction Manuals (Manual of Steel Construction, Minimum Design Loads, Timber Construction Manual)	LWFR-EXP5-000457- LWFR-EXP5-000459
66.		USEPA, <i>Indoor Air Quality-Basic Information-Formaldehyde</i> , Washington DC, 2007 <a href="http://epa.gov/iaq/formalde.html">http://epa.gov/iaq/formalde.html</a>	To be supplemented
67.		USDOL, OSHA, <i>OSHA Formaldehyde Standards</i> , Washington DC, 2008 <a href="http://www.osha.gov/SLTC/formaldehyde/standards.html">http://www.osha.gov/SLTC/formaldehyde/standards.html</a>	To be supplemented
68.		World Health Organization, <i>Air Quality Guidelines for Europe-Formaldehyde</i> , Copenhagen, DE, 2001 <a href="http://www.euro.who.int/document/aiq/5_8formaldehyde.pdf">http://www.euro.who.int/document/aiq/5_8formaldehyde.pdf</a>	To be supplemented
69.		Health Canada, <i>Residential Indoor Air Quality Guideline-Formaldehyde</i> , 2006 <a href="http://hc-sc.gc.ca/lewh-selnt/alternatives/hecs-sesc/pdf/pubs/air/formaldehyde-eng.pdf">http://hc-sc.gc.ca/lewh-selnt/alternatives/hecs-sesc/pdf/pubs/air/formaldehyde-eng.pdf</a>	To be supplemented
70.		NIOSH, <i>NIOSH Pocket Guide to Chemical Hazards</i> , 2005 <a href="http://www.cdc.gov/niosh/npg/npgd0293.html">http://www.cdc.gov/niosh/npg/npgd0293.html</a>	To be supplemented
71.		NIOSH, <i>Method 2016 (Formaldehyde), Issue 2, NIOSH Manual of Analytical Methods (NMAM), Fourth Edition</i> , 2003 <a href="http://www.cdc.gov/Niosh/nmam/pdfs/2016.pdf">http://www.cdc.gov/Niosh/nmam/pdfs/2016.pdf</a>	LWFR-EXP 11-001662 – LWFR-EXP 11-001668
72.		ACGIH, <i>Documentation of Threshold Limit Values and Biological Exposure Indices</i> , 2001	LWFR-EXP11-000136 – LWFR-EXP11-000137
73.		Singh, <i>Distribution of Selected Gaseous</i>	LWFR-EXP11-000138 -

		<i>Organic Mutagens and Suspect Carcinogens In Ambient Air</i>	LWFR-EXP11-000146
74.		ASHRAE – 62.2 <i>Ventilation and Acceptable Indoor Air Quality in Low Rise Residential Buildings</i>	LWFR-EXP11-000147 – LWFR-EXP11-000222
75.		AHSRAE Standard 62.1 - 2004	LWFR-EXP11-000223 – LWFR-EXP11-000224
76.		ASTM – 1827 Blower Door	LWFR-EXP11-000225 – LWFR-EXP11-000236
77.		ASTM E 1333	LWFR-EXP11-000237 – LWFR-EXP11-000248
78.		ATSDR 2007 Update Report	LWFR-EXP11-000253 – LWFR-EXP11-000293
79.		ATSDR 2007 Report FEMA Temporary Housing Units	LWFR-EXP 11-000772- LWFR-EXP 11-000785
80.		ATSDR Revised Report Baton Rouge	LWFR-EXP 11-000786 – LWFR-EXP 11-000826
81.		ATSDR Toxicological Profile for Formaldehyde	LWFR-EXP 11-000870 – LWFR-EXP 11-000883
82.		CTEH Protocol	LWFR-EXP 11-001032 – LWFR-EXP 11-001049
83.		Defendants’ Protocol	LWFR-EXP 11-001050 – LWFR-EXP 11-001067
84.		Fact Sheet Early Findings	LWFR-EXP 11-001193 – LWFR-EXP 11-001194
85.		FEMA Job Hazard Analysis Chart	LWFR-EXP 11-001289
86.		HCOH in Houston Houses	LWFR-EXP 11-001440 – LWFR-EXP 11-001444
87.		HCOH in LA CA Air - Grosjean	LWFR-EXP 11-001445 – LWFR-EXP 11-001453
88.		HCOH in Mobil Homes	LWFR-EXP 11-001454 – LWFR-EXP 11-001455
89.		HCOH in Urban Air	LWFR-EXP 11-001456 – LWFR-EXP 11-001459
90.		Hodgson, <i>VOCs in Indoor Air</i>	LWFR-EXP 11-001476 – LWFR-EXP 11-001506
91.		Litelpo, Inhaled HCOH	LWFR-EXP 11-001507 – LWFR-EXP 11-001536
92.		LBNL-254E Final Report	LWFR-EXP 11-001569 – LWFR-EXP 11-001629
93.		Lemus Study	LWFR-EXP 11-001630 – LWFR-EXP 11-001639
94.		Long term Particleboard Emission Decay Study	LWFR-EXP 11-001640 – LWFR-EXP 11-001643

95.		Any and all Federal, State, Local, and Industry Regulations and Guidelines discussed and relied upon by any Defendant and/or Plaintiff experts in this matter.	To be supplemented
	<b>Articles</b>		
96.		July 20, 2007 “Formaldehyde and FEMA Trailers” by Lee Shull, Ph.D	PSC021640 – PSC021641
97.		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
98.		“Effect of Formaldehyde Inhalation on Hsp70 in Seminiferous Tubules of rat testes: an immunohistochemical study” by O. Ozen, et al. (2005)	PSC021823 – PSC021829
99.		“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
100.		“Effects of Inhaled Formaldehyde on Learning and Memory of Mice” by Z. Lu, et al. (2008)	PSC021847 – PSC021854
101.		“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
102.		National Cancer Institute (NCI): Fact Sheet: Formaldehyde and Cancer Risk dated May 7, 2009	PSC021867 – PSC021873
103.		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
104.		FEMA media release: FEMA Awards Contracts for Low Emissions Travel	PSC021876 – PSC021879

		Trailers – April 7, 2009 – Release No. HQ-09-034b	
105.		FEMA media release: FEMA to Introduce New Type of Manufactured Home – Dec. 18, 2008 – Release No. 1791-343	PSC021880
106.		Article – “Formaldehyde Exposure in Nonoccupational Environments” by K. Dally, et al.	PSC021881 – PSC021888
107.		Article – “Formaldehyde-related Health Complaints of Residents Living in Mobile and Conventional Homes” by I. Ritchie, et al.	PSC021889 – PSC021894
108.		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
109.		Fact Sheet: Airborne Toxic Control Measure (ATCM) to Reduce Formaldehyde Emissions from Composite Wood Products	PSC026119 – PSC026120
110.		Environmental Health – Formaldehyde Exposure in Homes: A Reference for State Officials to Use in Decision-Making (March 2008)	PSC021897 – PSC021902
111.		Environmental Health – What you should know about Formaldehyde in Mobile Homes	PSC021903 – PSC021906
112.		Formaldehyde Levels in FEMA-Supplied Trailers; Early Findings from the Centers for Disease Control and Prevention	PSC003218 – PSC003219
113.		“ <i>Formaldehyde Indoors</i> ” by Dr. Stephen Smulski, April 1987, Progressive Builder, 12(4):9-11.	PSC002752 – PSC002754
114.		Boyson, M. “ <i>Nasal mucosa in workers exposed to formaldehyde: a pilot study.</i> ” Br J of Ind Med 47:116-121, 1990	PSC002845 – PSC002853
115.		Edling, C. “ <i>Occupational exposure to formaldehyde and histopathological changes in nasal mucosa.</i> ” Br J of Ind Med 45:761-765, 1988	PSC002854 – PSC002865
116.		Holmstrom, M. “ <i>Histological Changes in the Nasal Mucosa in Rats after Long-</i>	PSC002866 – PSC002881

		<i>term Exposure to Formaldehyde and Wood Dust.</i> ” Acta Otolaryngol (Stockh) 108:274-283, 1989	
117.		Holmstrom, M. “ <i>Histological Changes in the Nasal Mucosa in Persons Occupationally Exposed to Formaldehyde Alone and in Combination with Wood Dust.</i> ” Acta Otolaryngol (Stockh) 107:120-129, 1989	PSC002882 – PSC002893
118.		Garrett, MH. “ <i>Increased risk of allergy in children due to formaldehyde exposure in homes.</i> ” Allergy 1999; 54(4):330-7.	PSC002898 – PSC002905
119.		Jaakkola, JJ. “ <i>Asthma, Wheezing, and Allergies in Russian Schoolchildren in Relation to New Surface Materials in the Home.</i> ” Am J Public Health 2004;94(4):560-2	PSC002906 – PSC002909
120.		Platts-Mills, TA. “ <i>Indoor allergens and asthma: Report of the Third International Workshop.</i> ” J Allergy Clin Immunol 1997;100(6 Pt 1):S2-S24.	PSC002909 – PSC002931
121.		“ <i>Legacy of Shame: The On-Going Public Health Disaster of Children Struggling in Post-Katrina Louisiana.</i> ” Children’s Health Fund & Columbia Univ. Mailman School of Public Health, Nov. 4, 2008	PSC006033 – PSC006052
122.		“ <i>Children from FEMA trailer park battle serious health problems</i> ” USA Today 11/24/08	PSC006053 – PSC006054
123.		Wantke, F, “ <i>Exposure to gaseous formaldehyde induces IgE-mediated sensitization to formaldehyde in school-children</i> ” Clinical and Experimental Allergy, 1996, Vol. 26, pages 276-280	PSC006055 – PSC006059
124.		Krzyzanowski, Michal, “ <i>Chronic Respiratory Effects of Indoor Formaldehyde Exposure</i> ” Environmental Research 52, 117-125 (1990)	PSC006060 – PSC006068
125.		“ <i>Indoor Residential Chemical Emissions as Risk Factor for Children’s Respiratory Health</i> ” by M. Mendell	PSC022228 – PSC022267
126.		“ <i>Formaldehyde and Leukemia:</i>	PSC026121 –

		Epidemiology, Potential Mechanisms, and Implications for Risk Assessment” by Zhang, et al.	PSC026131
127.		“Formaldehyde-releasers: relationship to formaldehyde contact allergy. Contact allergy to formaldehyde and inventory of formaldehyde-releasers” by Groot, et al.	PSC026132 – PSC026154
128.		“Prospective study of clinical symptoms and skin test reactions in medical students exposed to formaldehyde gas” by Takahashi, et al.	JAMES-008350 JAMES-008356
129.		“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.	JAMES-008357 JAMES-008359
130.		Zinn, T.,D., Cline and W. Lehmann, <i>Long Term Study of Formaldehyde Emission Decay from Particleboard</i> , Forest Products Journal, June 1990.	To be supplemented
131.		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. U.S. Department of Health and Human Services Public Health Agency for Toxic Substances and Disease Registry. Atlanta Georgia.	LWFR-EXP11-000253- LWFR-EXP11-000293
132.		2004. ANSI/HPVA Hp-1-2004 American National Standard for Hardwood and Decorative Plywood. HPVA. Reston, Virginia.	To be supplemented
133.		1986. From Start to Finish Particleboard. National Particleboard Association. Gaithersburg, Maryland.	To be supplemented
134.		1986. From Start to Finish Medium Density Fiberboard. National Particleboard Association. Gaithersburg, Maryland.	To be supplemented
135.		2003. VOC Emission Barrier Effect of Laminates, Overlays and Coatings for Particleboard, Medium Density Fiberboard (MDF) and hardboard.	To be supplemented

		Composite Panel Association. Gaithersburg, Maryland.	
136.		Barry, A. and D. Corneau. 2006. Effectiveness of barriers to minimize VOC emissions including formaldehyde. <i>Forest Products Journal</i> . 56(9):38-42	To be supplemented
137.		Groah, W., G. Gramp and M. Trant. 1984. Effect of a decorative vinyl overlay on formaldehyde emissions. <i>Forest Products Journal</i> 34(4):27-29.	To be supplemented
138.		J. Thompson, et al., "Malingering" in <i>Textbook of Forensic Psychiatry</i> (2004), p. 427-449	To be supplemented
139.		Seattle Times Op-Ed, June 6, 1980, A-7, "Formaldehyde Not Dangerous"	LWFR-GEN-000081
140.		Paustenbach, Dennis, <i>Corporate Occupational Exposure Limits the Current State of Affairs</i> , AIHA Journal, 1986	LWFR-EXP3-000071- LWFR-EXP3-000080
141.		Atchison, J. and Brown, J., <i>The Lognormal Distribution</i> , Cambridge University Press, 1957	LWFR-EXP3-000081- LWFR-EXP3-000086
142.		William H. Bullock, et al., <i>A Strategy for Assessing and managing Occupational Exposures</i> , AIHA (2006) (excerpts)	LWFR-EXP3-000087- LWFR-EXP3-000099
143.		Esman, et al, Log-Normality of Environmental Sampling Data, <i>Journal of Environmental Science and Health</i> (1977)	LWFR-EXP3-000100- LWFR-EXP3-000112
144.		Falk, Eric K., <i>A Short Explanation of Retrospective Exposure Assessment and its Use in Toxic Tort Litigation</i> , Toxic Torts and Environmental Law Committee Newsletter (Winter 2009)	LWFR-EXP3-000113- LWFR-EXP3-000114
145.		Gibbons and Coleman, <i>Statistical Methods for Detection and Quantification of Environmental Contamination</i> (2001)	LWFR-EXP3-000115- LWFR-EXP3-000122
146.		Glibert, Richard O., <i>Statistical Methods for Environmental Pollution Monitoring</i> (excerpts) (1987)	LWFR-EXP3-000123- LWFR-EXP3-000129
147.		Hewett, Paul, Mean Testing: II. Comparison of Several Alternative Procedures, <i>Applied Occupational and</i>	LWFR-EXP3-000130- LWFR-EXP3-000138

		Environmental Hygiene (1997)	
148.		Hewett, Paul, "Chapter 16. Industrial Hygiene Exposure Assessment – Data Analysis and Interpretation", from Handbook of Chemical Safety and Health (2001)	LWFR-EXP3-000139- LWFR-EXP3-000169
149.		Hodgson, et al., <i>Volatile Organic compound Concentrations and Emission Rates in New Manufactured and Site-Built Homes</i> , Indoor Air (2000)	LWFR-EXP3-000217- LWFR-EXP3-000232
150.		Land, C.E., <i>Tables of Confidence Limits for Linear Functions of the Normal Mean and Variance</i> , American Mathematical Society (1975)	LWFR-EXP3-000233- LWFR-EXP3-000239
151.		Nielsen, et al., <i>Chemical and Biological Evaluation of Building Material Emissions</i> , Indoor Air (1997)	LWFR-EXP3-000241- LWFR-EXP3-000256
152.		Paustenbach, Dennie, <i>Occupational Exposure Limits, Pharmacokinetics, and Unusual Work Schedules</i> (Chapter 7) (1994)	LWFR-EXP3-000258- LWFR-EXP3-000259
153.		Suta, Benjamin, <i>Population Exposures to Atmospheric Formaldehyde Inside Residences</i> , report to EPA (1980)	LWFR-EXP3-000260- LWFR-EXP3-000272
154.		Versar Final Report: "Formaldehyde Exposure Model – Description and Demonstration" (1986)	LWFR-EXP3-000279- LWFR-EXP3000272
155.		Viet, et al., Guideline on Occupational Exposure Reconstruction, AIHA Guideline 11-2008	LWFR-EXP3-000280- LWFR-EXP3-000285
156.		White, et al., Principles of Exposure Measurement in Epidemiology, (excerpts) Oxford University Press (2008)	LWFR-EXP3-000286- LWFR-EXP3-000290
157.		Helena Ribeiro, Sugar Cane Burning in Brazil: Respiratory Health Effects, Rev. Saude Publica Vol. 42 no.2 Sao Paulo Apr. 2008 Epub February 29, 2008	LWFR-EXP7-009919- LWFR-EXP7-009926
158.		Lewis, <i>Sax's Dangerous Properties of Industrial Materials Tenth Edition and Hawley's Condensed Chemical Dictionary Thirteenth Edition</i> , Wiley, Hoboken, NJ, 2000.	To be supplemented
159.		California EPA, ARB, <i>Indoor Air</i>	To be supplemented

		<i>Quality Guideline-Formaldehyde in the Home, 2004</i> <a href="http://www.arb.ca.gov/researchiindoor/formaldg108-04.pdf">http://www.arb.ca.gov/researchiindoor/formaldg108-04.pdf</a>	
160.		<i>Formaldehyde Sampling: Active and Passive Sampling Protocols</i> , DeVany, 2008	To be supplemented
161.		AIHA, <i>AIHA Field Guide for Determination of Biological Contaminants</i> , Second Edition, 2005	To be supplemented
162.		Casset A, Purohit A, Marchand C, et al.: “The Bronchial response to inhaled formaldehyde”	LWFR-EXP15-000131- LWFR-EXP15-000141
163.		Dingle P; “Formaldehyde in Occupied and Unoccupied Caravans in Australia”	LWFR-EXP15-000142- LWFR-EXP15-000147
164.		Songul Acar Vaizoglu; “Determining Domestic Formaldehyde Levels in Ankara, Turkey”	LWFR-EXP15-000148- LWFR-EXP15-000155
165.		Fenna A Ebbens, MD, MSc; “The Mold Conundrum in Chronic Rhinosinusitis: Where Do We Stand Today?”	LWFR-EXP15-000156- LWFR-EXP15-000164
166.		American College of Occupational and Environmental Medicine “Adverse Human Health Effects Associated with Molds in the Indoor Environment”	LWFR-EXP15-000209- LWFR-EXP15-000222
167.		Affidavit of Patricia M. Williams, PH.D. D.A..B.T. in the Trial of Alana Alexander And Christopher Cooper	LWFR-EXP15-000223- LWFR-EXP15-000264
168.		Allenby CF, Basketter DA; “The effect of repeated open exposure to low levels of nickel on compromised hand skin of nickel-allergic subjects”	LWFR-EXP15-000165- LWFR-EXP15-000169
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		Chart on Formaldehyde concentrations and Genotoxicity and Cytotoxicity	To be supplemented
		Report of Patricia M. Williams PhD, DABT on Lyndon Wright	To be supplemented
		Charts on error rate/false positives/false negatives of TRUE Test	To be supplemented
		Chart on Reproducibility of TRUE Test results	To be supplemented
		Diagram of chemical reactions in TRUE Test	To be supplemented
		Chart on OSHA and gaseous Formaldehyde and eczema and cancer	To be supplemented
		Chart on Scientific Literature and Cancers and Formaldehyde	To be supplemented
		Chart on Sensitive Populations	To be supplemented
		Chart on ATSDR Minimal Risk Levels	To be supplemented
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		Wantke, et al., <i>Exposure to formaldehyde and phenol during anatomy dissecting course: sensitizing potency of formaldehyde in medical students</i> , Allergy (2000)	LWFR-EXP 15-002118- LWFR-EXP15-002122
		Ward, et al., <i>A comparison of expression of surface-bound immunoglobulin E on antigen-presenting cells in cutaneous tissue between patients with allergic, irritant and atopic dermatitis</i> , Contact Dermatitis (1991)	LWFR-EXP 15-002123- LWFR-EXP15-002130
		White, et al., <i>Oral Tolerance to contact allergens: a common occurrence? A review</i> , Contact Dermatitis (2007)	LWFR-EXP 15-002137- LWFR-EXP15-002145
		Zaghi and Maibach, <i>Quantitative Relationships Between Patch Test Reactivity and Use Test Reactivity: An Overview</i> , Cutaneous and Ocular Toxicology (2008)	LWFR-EXP 15-002151- LWFR-EXP15-002160
		Ziem and McTamney, <i>Profile of Patients with Chemical Injury and Sensitivity</i> , Environmental Health Perspectives (1997)	LWFR-EXP 15-002161- LWFR-EXP15-002176
		Gibson, James, <i>Formaldehyde Toxicity</i> , (1983)	LWFR-EXP 15-002177- LWFR-EXP15-002178
88.		Any and all articles identified and/or relied upon by Plaintiff and/or Defendant experts in the preparation of	To be supplemented

		their reports.	
	<b>Expert Records and Files</b>		
89.		Affidavit and Weather Data of Lee E. Branscome, Ph.D., C.C.M.	LWFR-EXP1-000001 – LWFR-EXP1-000122
90.		Curriculum Vitae of Lee E. Branscome, Ph.D., C.C.M.	PSC 025205- PSC 025214
92.		Medical Records of Lyndon Wright and file of George Farber, M.D.	LWFR-EXP2-000021 – LWFR-EXP2-000052
93.		Preliminary Report of Paul Hewett, Ph.D.	LWFR-EXP3-000001 – LWFR-EXP3-000026
		Final Report of Paul Hewett, Ph.D.	LWFR-EXP2-000027- LWFR-EXP2-000060
		Supplemental Report of Paul Hewett, Ph.D. (to be produced)	To be supplemented
94.		Curriculum Vitae of Paul Hewett, Ph.D.	PSC 025265- PSC 025269
		Paul Hewett August 20, 2008 Technical Report in FEMA Formaldehyde Products Liability Litigation	LWFR-EXP3-000170- LWFR-EXP3-000197
		Paul Hewett Report for Gulf Stream / Alexander Trial	LWFR-EXP3-000198- LWFR-EXP3-000216
		Letter from FEMA to Trailer Occupants Re: Formaldehyde levels found in their trailers	PSC 019684- PSC 019692
96.		Deposition Testimony of Paul Hewett, Ph.D.	To be supplemented
98.		Preliminary Report of Kenneth Laughery, Ph.D.	LWFR-EXP6-000001- LWFR-EXP6-000006
		Final Report of Kenneth Laughery, Ph.D.	LWFR-EXP6-000007- LWFR-EXP6-000013
99.		Curriculum Vitae of Kenneth Laughery, Ph.D.	PSC 025282- PSC 025313
103.		Preliminary Report of Alexis Mallet, Jr.	LWFR-EXP7-000001- LWFR-EXP7-000013
		Final Report of Alexis Mallet, Jr.	LWFR-EXP7-000014- LWFR-EXP7-000144
		Photographs for Report of Alexis Mallet, Jr.	LWFR-EXP7-000145- LWFR-EXP7-000184
104.		Curriculum Vitae of Alexis Mallet, Jr.	PSC 025314- PSC 025324
		Alexis Mallet, Jr., emails re discussion of Parish Permit	LWFR-EXP7-009495- LWFR-EXP7-009497

		Alexis Mallet, Jr., emails re Newspaper Article on Orleans Parish Electrical Codes	LWFR-EXP7-009503- LWFR-EXP7-009526
		Letter from Blanco to Thomas, 09/23/05	LWFR-EXP7-009527- LWFR-EXP7-009545
		Alexis Mallet emails and attached letters concerning Permit Regulations in Orleans Parish	LWFR-EXP7-009503- LWFR-EXP7-009526
		Policies and Code Clarifications	LWFR-EXP7-009546- LWFR-EXP7-009547
		Shaw Daily Quality Control Report, 11/29/05	LWFR-EXP7-009548- LWFR-EXP7-009551
		Shaw emails regarding Orleans Parish Permit and Code Requirements	LWFR-EXP7-009552
		Mach 15 RV Air Condition	LWFR-EXP7-009553- LWFR-EXP7-009554
		RVP Installation Instructions for 8000 Series Air Conditioners	LWFR-EXP7-009555- LWFR-EXP7-009570
		RVP Operation and Maintenance Instructions for 6000, 7000, and 8000 Series Air Conditioners	LWFR-EXP7-009571- LWFR-EXP7-009578
		RVP Data Inquiry Sheet	LWFR-EXP7-009579- LWFR-EXP7-009580
		FEMA-Dubuclet Report 7/14/09	LWFR-EXP7-009581- LWFR-EXP7-009582
		Email from Wyatt Rankin to Alex Mallet, 5/19/09	LWFR-EXP7-009602
		Bayseal CC	LWFR-EXP7-009603- LWFR-EXP7-009604
		Bayseal CC for Residential Builders	LWFR-EXP7-009605- LWFR-EXP7-009606
		Chemical Design, Closed Cell Spray Foam	LWFR-EXP7-009607- LWFR-EXP7-009611
		Green Home Builder Creates Environmentally Friendly Home with Closed Cell Foam	LWFR-EXP7-009612- LWFR-EXP7-009613
		EnviroFoam Insulation	LWFR-EXP7-009614- LWFR-EXP7-009621
		Dometic Installation Instructions	LWFR-EXP7-009583- LWFR-EXP7-009601
		Forest River Appliance Information Sheet	LWFR-EXP7-009614- LWFR-EXP7-009622
		Emails regarding Fluor Jacking Instructions	LWFR-EXP7-009643- LWFR-EXP7-009644

		Fluor FEMA Procedures	LWFR-EXP7-009645- LWFR-EXP7-009655
		Important Information for Travel Trailer Occupants	LWFR-EXP7-009656- LWFR-EXP7-009657
		Formaldehyde Levels in FEMA-Supplied Trailers	LWFR-EXP7-009658- LWFR-EXP7-009659
		Suburban Gas Furnaces Installation Instruction	LWFR-EXP7-009660- LWFR-EXP7-009688
		Emails regarding CH20 Information	LWFR-EXP7-009689
		Information from Composite Panel Association Website	LWFR-EXP7-009690- LWFR-EXP7-009708
		Maxx Fan Installation Instructions	LWFR-EXP7-009709- LWFR-EXP7-009713
		Emails regarding Closed Cell Foam	LWFR-EXP7-009714- LWFR-EXP7-009717
		Versi-Foam Systems	LWFR-EXP7-009718- LWFR-EXP7-009732
		Chemical Design Product Catalog: Closed Cell Spray Foam	LWFR-EXP7-009733- LWFR-EXP7-009747
		Tool Box Training: Proper Jacking Techniques	LWFR-EXP7-009748
		Emails Regarding Shaw Jacking Procedure	LWFR-EXP7-009749- LWFR-EXP7-009750
		MHRA Website on Moisture Field Study	LWFR-EXP7-009751- LWFR-EXP7-009752
		MHRA Minimizing Moisture Problems Report	LWFR-EXP7-009753- LWFR-EXP7-009799
		MHRA Report Page with Handwritten Note	LWFR-EXP7-009800- LWFR-EXP7-009801
		Building your Louisiana House	LWFR-EXP7-009802- LWFR-EXP7-009804
		Email regarding Gulf Stream Coach Construction	LWFR-EXP7-009805- LWFR-EXP7-009806
		RESNET Standards Chapter Seven	LWFR-EXP7-009850- LWFR-EXP7-009877
		RESNET National Home Energy Rating Technical Guidelines 12/28/05	LWFR-EXP7-009878- LWFR-EXP7-009918
		Performance Work Statement: Individual Assistance-Technical Assistance Contract	LWFR-EXP7-009927- LWFR-EXP7-009945
		Email from Alexis Mallet to Alexis Mallet regarding Electronic Code of Federal Regulations	LWFR-EXP7-009958- LWFR-EXP7-009959
		Stephen Patterson and Madan Mahta,	LWFR-EXP7-009960-

		Roofing Design and Practice	LWFR-EXP7-009962
		Email from Orleans Parish re: Code Enforcement	LWFR-EXP7-13951
106.		Trailer drawings by Alexis Mallet, Jr./Ervin Ritter	LWFR-EXP7-13933- LWFR-EXP7-13950
		Trailer Photographs by Alexis Mallet, Jr.	LWFR-EXP7-004671- LWFR-EXP7-005396; LWFR-EXP7-005401- LWFR-EXP7-005513; LWFR-EXP7-005518- LWFR-EXP7-005546; LWFR-EXP7-005554- LWFR-EXP7-005571; LWFR-EXP7-005574- LWFR-EXP7-005725; LWFR-EXP7-005726- LWFR-EXP7-006465; LWFR-EXP7-010628- LWFR-EXP7-010942; LWFR-EXP7-010999- LWFR-EXP7-011539; LWFR-EXP7-011541- LWFR-EXP7-011629; LWFR-EXP7-011660- LWFR-EXP7-011661; LWFR-EXP7-011749- LWFR-EXP7-011816; LWFR-EXP7-011822- LWFR-EXP7-012292; LWFR-EXP7-012782- LWFR-EXP7-013440; LWFR-EXP7-013441- LWFR-EXP7-013932
		Trailer Videos by Alexis Mallet, Jr.	LWFR-EXP7-005397; LWFR-EXP7-005398; LWFR-EXP7-005399; LWFR-EXP7-005400;
		Trailer Images by Alexis Mallet, Jr.	LWFR-EXP7-008043- LWFR-EXP7-009430
		Data Logger Information by Alexis Mallet, Jr.	1 LWFR-EXP7-012293- 1 LWFR-EXP7-012370; 2 LWFR-EXP7-012371- 2 LWFR-EXP7-012448; 3 LWFR-EXP7-012449- 3 LWFR-EXP7-012522;

			4 LWFR-EXP7-012523- 4 LWFR-EXP7-012600; 5 LWFR-EXP7-012601- 5 LWFR-EXP7-012678; 6 LWFR-EXP7-012679- 6 LWFR-EXP7-012756
		Ritter Consulting Engineers Handwritten Notes	LWFR-EXP7-011817- LWFR-EXP7-011821
109.		Preliminary Report of Lawrence G. Miller, M.D., M.P.H.	LWFR-EXP8-000001- LWFR-EXP8-000009
		Final Report of Lawrence G. Miller, M.D., M.P.H.	LWFR-EXP8-000010 LWFR-EXP8-000019
		Supplemental Report of Lawrence G. Miller, M.D., M.P.H.	LWFR-EXP8-000108- LWFR-EXP8-000109
110.		Curriculum Vitae of Lawrence G. Miller, M.D., M.P.H.	PSC 025360- PSC 025375
		Temporary Medical License for Dr. Lawrence Miller	To be supplemented
113.		Exhibits from the deposition of Lawrence G. Miller, M.D., M.P.H.	To be supplemented
114.		Preliminary Report of Charles David Moore, P.E. P.L.S.	LWFR-EXP9-000001- LWFR-EXP9-000004
		Final Report of Charles David Moore, P.E. P.L.S.	LWFR-EXP5-000005- LWFR-EXP5-000042
115.		Curriculum Vitae of Charles David Moore, P.E. P.L.S.	PSC 025346- PSC 025349
		Construction Manuals (Manual of Steel Construction, Minimum Design Loads, Timber Construction Manual)	LWFR-EXP5-000457- LWFR-EXP5-000459
119.		Preliminary Report of Ervin Ritter, P.E.	LWFR-EXP10-000001- LWFR-EXP10-000007
		Final Report of Ervin Ritter, P.E.	LWFR-EXP10-000008- LWFR-EXP10-000117
120.		Curriculum Vitae of Ervin Ritter, P.E.	PSC 025350- PSC 025354
121.		Reliance Materials and File of Ervin Ritter, P.E.	To be supplemented
122.		Deposition Testimony of Ervin Ritter, P.E.	To be supplemented
123.		Exhibits from the deposition of Ervin Ritter, P.E.	To be supplemented
		All photographs by Ervin Ritter	LWFR-EXP10-000118- LWFR-EXP10-002068
124.		Preliminary Report of William D. Scott,	LWFR-EXP11-000001-

		P.E., C.H.M.M.	LWFR-EXP11-000042
		Final Report of William D. Scott, P.E., C.H.M.M.	LWFR-EXP11-000043- LWFR-EXP11-000135
125.		Curriculum Vitae of William D. Scott, P.E., C.H.M.M.	PSC 025355- PSC 025368
126.		Reliance Materials and File of William D. Scott, P.E., C.H.M.M.	To be supplemented
127.		Deposition Testimony of William D. Scott, P.E. C.H.M.M.	To be supplemented
128.		Exhibits from the deposition of William D. Scott, P.E., C.H.M.M.	To be supplemented
129.		Microbial Growth Report by W.D. Scott and Associates	To be supplemented
130.		Preliminary Report of Edward H. Shwery, Ph.D.	LWFR-EXP12-000001- LWFR-EXP12-000011
		Preliminary Report of Edward H. Shwery, Ph.D.	LWFR-EXP12-000012- LWFR-EXP12-000016
131.		Curriculum Vitae of Edward H. Shwery, Ph.D.	PSC 025369- PSC 025391
		Edward H. Shwery Testing Raw Data and Notes	LWFR-EXP12-000061- LWFR-EXP12-000128
132.		Reliance Materials and File of Edward H. Shwery, Ph.D.	To be supplemented
133.		Deposition Testimony of Edward H. Shwery, Ph.D.	To be supplemented
134.		Exhibits from the deposition of Edward H. Shwery, Ph.D.	To be supplemented
135.		Preliminary Report of Stephen Smulski, Ph.D.	LWFR-EXP13-000001- LWFR-EXP13-000022
		Final Report of Stephen Smulski, Ph.D.	LWFR-EXP13-000023- LWFR-EXP13-000061
136.		Curriculum Vitae of Stephen Smulski, Ph.D.	PSC 025392- PSC 025406
		Emails between Stephen Smulski and Composite Panel Association	To be supplemented
137.		Reliance Materials and File of Stephen Smulski, Ph.D.	To be supplemented
		Additional Reliance Documents, not yet produced by Stephen Smulski, Ph.D.	To be supplemented
		Photographs by Stephen Smulski, Ph.D.	LWFR-EXP13-004164 LWFR-EXP13-004354
138.		Deposition Testimony of Stephen Smulski, Ph.D.	To be supplemented
139.		Exhibits from the deposition of Stephen	To be supplemented

		Smulski, Ph.D.	
140.		Preliminary Report of Patricia M. Williams, Ph.D. D.A.B.T.	LWFR-EXP15-000001- LWFR-EXP15-000054
		Final Report of Patricia M. Williams, Ph.D., D.A.B.T.	LWFR-EXP15-000055- LWFR-EXP15-000130
141.		Curriculum Vitae of Patricia M. Williams, Ph.D., D.A.B.T.	PSC 025407- PSC 025437
		Fee Schedule of Patricia M. Williams, Ph.D., D.A.B.T.	PSC 025438
		List of Testimonies of Patricia M. Williams, Ph.D., D.A.B.T.	PSC 025439- PSC 025440
142.		Reliance Material and File of Patricia M. Williams, Ph.D., D.A.B.T.	To be supplemented
143.		Deposition Testimony of Patricia M. Williams, Ph.D., D.A.B.T.	To be supplemented
144.		Exhibits from the deposition of Patricia M. Williams, Ph.D., D.A.B.T.	To be supplemented
145.		Preliminary Report of Paul LaGrange	LWFR-EXP5-000001- LWFR-EXP5-000002
		Final Report of Paul LaGrange	LWFR-EXP5-000003- LWFR-EXP5-000316
		Supplemental Report of Paul LaGrange	To be supplemented
146.		Curriculum Vitae of Paul LaGrange	PSC 026031- PSC 026034
		Fee Schedule of Paul LaGrange	PSC 026035
		List of Testimonies of Paul LaGrange	PSC 026036
147.		Reliance Materials and File of Paul LaGrange	To be supplemented
		Additional Documents of Paul LaGrange	LWFR-EXP5-000317- LWFR-EXP5-000570
		Photographs by Paul LaGrange	LWFR-EXP5-000595- LWFR-EXP5-001243; LWFR-EXP5-001244- LWFR-EXP5-001271
		Videos by Paul LaGrange	LWFR-EXP5-000572; LWFR-EXP5-000575; LWFR-EXP5-000573; LWFR-EXP5-000574; LWFR-EXP5-000578
		Initial Place Holding Report	LWFR-EXP5-000576- LWFR-EXP5-000577
		Paul LaGrange Handwritten Notes; Inspection Notes	LWFR-EXP5-000579- LWFR-EXP5-000594
		LaGrange Report	LWFR-EXP 5-000001 –

			LWFR-EXP 5-000316; PSC 026031 – PSC 026036
		Dometic Installation Instructions	FR-LTW-EXP06-107751 – FR-LTW-EXP06-107769
		LaGrange Video Animation with You Tube link	LWFR-EXP 5-001277
		LaGrange HVAC Load Calculations (Corrected Manual J Load)	LWFR-EXP 5-001278 – LWFR-EXP 5-001296
		LaGrange Supplemental Letter of Clarification	LWFR-EXP 5-001272 – LWFR-EXP 5-001273
		LaGrange Tectite Blower Door Test Report	LWFR-EXP 5-001274 – LWFR-EXP 5-001276
148.		Deposition Testimony of Paul LaGrange	To be supplemented
149.		Exhibits from the deposition of Paul LaGrange	To be supplemented
150.		Preliminary Report of Dr. Richard A Spector	LWFR-EXP14-000001- LWFR-EXP14-000004
		Final Report of Dr. Richard A. Spector	LWFR-EXP14-000005- LWFR-EXP14-000015
151.		Curriculum Vitae of Dr. Richard A. Spector	PSC 026027- PSC 026030
152.		Reliance Materials and File of Dr. Richard A. Spector	To be supplemented
153.		Deposition Testimony of Dr. Richard A. Spector	To be supplemented
154.		Exhibits from the deposition of Dr. Richard A. Spector	To be supplemented
155.		Any supplemental Affidavits or Reliance Material by Plaintiff's or Defendants' Experts	To be supplemented
156.		Any deposition testimony provided by any and all plaintiff and/or deposition fact and/or expert witness in this matter.	To be supplemented
157.		Any and all demonstrative evidence to be developed and/or utilized by Plaintiff's experts at trial	To be supplemented
158.		Any additional exhibits identified at deposition of any expert or fact witness in this matter.	To be supplemented
		Any document to be identified by Plaintiff in the ongoing discovery and deposition process	To be supplemented

		All Photographs taken by Plaintiff or Plaintiff's Experts	To be supplemented
		Any Plaintiff supplementation of any report and supplementing documents which may occur	To be supplemented
		Any and all Plaintiff demonstrative aids for trial to be exchanged at the appropriate time	To be supplemented
	<b>Testing Database</b>		
159.		Formaldehyde Testing Database prepared by the PSC	To be supplemented
	<b>Testing Documents</b>		
		Bill Scott Testing Data, October, 2008	To be supplemented
		Bill Scott Testing Data, August, 2009	To be supplemented
		Mold Testing Data	To be supplemented
		Plaintiff's Testing Protocol	To be supplemented
		All Testing Results Produced Relating to Lyndon Wright Unit	To be supplemented
	<b>Inspection in Melville, LA</b>		
160.		Photographs taken by Plaintiffs/Plaintiff's Experts during destructive testing at FEMA Staging/Storing Facility in Melville, Louisiana.	To be supplemented
161.		Video taken by Plaintiff/Plaintiff's Experts during the destructive testing at FEMA Staging/Storage Facility in Melville, Louisiana.	To be supplemented
162.		Photographs taken by Defendants/Defendants' Experts during destructive testing.	To be supplemented
163.		Video taken by Defendants/Defendants' Experts during destructive testing.	To be supplemented
164.		Animations created by C4 Animation (Reagan Johnson)	To be supplemented
166.		Results of all testing and inspection of the Forest River/Wright unit including, but not limited to, air sampling, temperature, humidity, and photographs thereof	To be supplemented
168.		Test Results of mold sampling	To be supplemented

		performed by WD Scott Group during destructive testing.	
169.		Test Results of mold sampling taken by Defendants' Experts during destructive testing.	To be supplemented
171.		Exemplar of a Personal Monitoring System for Aldehydes (Exemplar Passive Dosimeter)	To be supplemented
172.		Exemplars of Various Component Wood Products from Lyndon Wright Forest River Travel Trailer.	To be supplemented
173.		Exemplars of Alternative Wood Products from Lyndon Wright Forest River Travel Trailer.	To be supplemented
174.		All additional measurements to measurements and graphic representations of Lyndon Wright trailer to be identified	To be supplemented
	<b>Forest River, Inc.</b>		
175.		Forest River, Inc., Lyndon Wright trailer unit file	FR-0151924 FR-151946
176.		Any and all Class certification Forest River deposition testimony	To be supplemented
177.		Any and all Class certification Forest River deposition exhibits / documents produced	To be supplemented
178.		Forest River Owner's Manual	FOREST 0002399- FOREST 0002483
		Forest River Draft Testing Protocol	FR-LTW-EXP06-06698- FR-LTW-EXP06-006701
179.		FEMA Specifications	FOREST 0003284- FOREST 0003289
180.		NACS Correspondence and Solicitation and emails	FOREST 0002503- FOREST 0002508; FOREST 0003521
181.		Any and all Internal emails and communications relevant to FEMA production	To be supplemented
		Liberty Building Emails	FR-LTW-EXP06- 019602; FR-LTW-EXP06- 019676- FR-LTW-EXP06-

			019678; FR-LTW-EXP06-019631- FR-LTW-EXP06-019634; FR-LTW-EXP06-019688- FR-LTW-EXP06-019698; FR-LTW-EXP06-019648- FR-LTW-EXP06-019653; FR-LTW-EXP06-019637- FR-LTW-EXP06-019644; FR-LTW-EXP06-019609- FR-LTW-EXP06-019616; FR-LTW-EXP06-019603- FR-LTW-EXP06-019608
		Email between John Odom and Don Snell 10/22/09 (Exhibit 20 of Liberty Deposition)	To be supplemented
		ANSI/ASHRAE Standard 62.2-2004, pp. 9-10	FR-LTW-EXP06-006498- FR-LTW-EXP06-006499
182.		Any and all Deposition Testimony of Elton Kiefer	To be supplemented
183.		Any and all Exhibits from the deposition(s) of Elton Kiefer	To be supplemented
184.		Any and all Deposition Testimony of Jeff Burrian	To be supplemented
185.		Any and all Exhibits from the deposition(s) of Jeff Burrian	To be supplemented
186.		Affidavits of Norman Nelson	To be supplemented
187.		Curriculum Vitae of Norman Nelson	FR-LTW-EXP06-019726- FR-LTW-EXP06-019729
188.		Reliance Materials and File of Norman Nelson	To be supplemented

189.		Any and all Deposition Testimony of Norman Nelson	To be supplemented
190.		Any and all Exhibits from the deposition(s) of Norman Nelson	To be supplemented
191.		Report of G. Graham Allan	LTW-EXP01-000001- LTW-EXP01-000003
192.		Curriculum Vitae of G. Graham Allan	LTW-EXP01-000004- LTW-EXP01-000036
		Fee Schedule of G. Graham Allen	LTW-EXP01-000037
		List of Testimonies of G. Graham Allen	LTW-EXP01-000038
193.		Reliance Materials and File of G. Graham Allan	To be supplemented
194.		Any and all Deposition Testimony of G. Graham Allan	To be supplemented
195.		Any and all Exhibits from the deposition(s) of G. Graham Allan	To be supplemented
196.		Report of Philip Cole, M.D.	FR-LTW-EXP02- 000001- FR-LTW-EXP02-000020
		Report of Philip Cole, M.D.	FR-LTW-EXP02- 000041- FR-LTW-EXP02-000060
197.		Curriculum Vitae of Philip Cole, M.D.	FR-LTW-EXP02- 000021- FR-LTW-EXP02-000037
		List of Testimonies of Philip Cole, M.D.	FR-LTW-EXP02-000038 FR-LTW-EXP02-000040
198.		Reliance Materials and File of Philip Cole, M.D.	To be supplemented
199.		Any and all Deposition Testimony of Philip Cole, M.D.	To be supplemented
200.		Any and all Exhibits from the deposition(s) of Philip Cole, M.D.	To be supplemented
201.		Affidavits of Nathan T. Dorris	To be supplemented
202.		Curriculum Vitae of Nathan T. Dorris	FR-LTW-EXP03- 000001- FR-LTW-EXP03-000015
203.		Reliance Materials and File of Nathan T. Dorris	To be supplemented
204.		Any and all Deposition Testimony of Nathan T. Dorris	To be supplemented
205.		Any and all Exhibits from the deposition(s) of Nathan T. Dorris	To be supplemented
206.		Report of William L. Dyson	FR-LTW-EXP04-

			000001- FR-LTW-EXP04-000019
207.		Curriculum Vitae of William L. Dyson	FR-LTW-EXP04- 000020- FR-LTW-EXP04-000023
		Fee Schedule of William L. Dyson	FR-LTW-EXP04-000024
		List of Testimonies of Williams L. Dyson	FR-LTW-EXP04- 000025- FR-LTW-EXP04-000031
208.		Reliance Materials and File of William L. Dyson	FR-LTW-EXP04- 000001- FR-LTW-EXP04-000567
209.		Any and all Deposition Testimony of William L. Dyson	To be supplemented
210.		Any and all Exhibits from the deposition(s) of William L. Dyson	To be supplemented
211.		Report of Thomas Fribley	FR-LTW-EXP05- 000001- FR-LTW-EXP05-000003
212.		Curriculum Vitae of Thomas Fribley	FR-LTW-EXP05- 000004- FR-LTW-EXP05-000008
213.		Reliance Materials and File of Thomas Fribley	FR-LTW-EXP05- 000001- FR-LTW-EXP05-001454
214.		Any and all Deposition Testimony of Thomas Fribley	To be supplemented
215.		Any and all Exhibits from the deposition(s) of Thomas Fribley	To be supplemented
216.		Affidavits of Don Snell	To be supplemented
217.		Curriculum Vitae of Don Snell	FR-LTW-EXP06- 019731- FR-LTW-EXP06-019735
218.		Reliance Materials and File of Don Snell	To be supplemented
219.		Any and all Deposition Testimony of Don Snell	To be supplemented
220.		Any and all Exhibits from the deposition(s) of Don Snell	To be supplemented
221.		Affidavits of Kenneth B. Smith	To be supplemented
222.		Curriculum Vitae of Kenneth B. Smith	LTW-EXP07-000001- LTW-EXP07-000002
		Fee Schedule of Kenneth B. Smith	LTW-EXP07-000003- LTW-EXP07-000004
223.		Reliance Materials and File of Kenneth	LTW-EXP07-000001-

		B. Smith	LTW-EXP07-000291
224.		Any and all Deposition Testimony of Kenneth B. Smith	To be supplemented
225.		Any and all Exhibits from the deposition(s) of Kenneth B. Smith	To be supplemented
226.		Report of Dr. John W. Thompson	FR-LTW-EXP08-000001- FR-LTW-EXP08-000015
227.		Curriculum Vitae of Dr. John W. Thompson	FR-LTW-EXP08-000016- FR-LTW-EXP08-000037
		List of Testimonies of Dr. John W. Thompson	FR-LTW-EXP08-000038- FR-LTW-EXP08-000052
		Fee Schedule of Dr. John W. Thompson	FR-LTW-EXP08-000053
228.		Reliance Materials and File of Dr. John W. Thompson	FR-LTW-EXP08-000001- FR-LTW-EXP08-002293
229.		Any and all Deposition Testimony of Dr. John W. Thompson	To be supplemented
230.		Any and all Exhibits from the deposition(s) of Dr. John W. Thompson	To be supplemented
231.		Affidavits of Tony Watson	To be supplemented
232.		Curriculum Vitae of Tony Watson	FR-LTW-EXP09-000169- FR-LTW-EXP09-000170
		List of Trial Testimonies of Tony Watson	FR-LTW-EXP09-000171
233.		Reliance Materials and File of Tony Watson	To be supplemented
234.		Any and all Deposition Testimony of Tony Watson	To be supplemented
235.		Any and all Exhibits from the deposition(s) of Tony Watson	To be supplemented
236.		Affidavits of H. James Wedner, M.D.	Bates Range to be supplied upon receipt of same
237.		Curriculum Vitae of H. James Wedner, M.D.	Bates Range to be supplied upon receipt of same
238.		Reliance Materials and File of H. James Wedner, M.D.	Bates Range to be supplied upon receipt of same
239.		Any and all Deposition Testimony of H.	To be supplemented

		James Wedner, M.D.	
240.		Any and all Exhibits from the deposition(s) of H. James Wedner, M.D.	To be supplemented
241.		Any and all Deposition Testimony of Jaime Albrecht	To be supplemented
242.		Any and all Exhibits from the deposition(s) of Jaime Albrecht	To be supplemented
243.		Any and all Deposition Testimony of Jim Foltz	To be supplemented
244.		Any and all Exhibits from the deposition(s) of Jim Foltz	To be supplemented
245.		Any and all Deposition Testimony of Forest River Warranty Officer, yet to be designated	To be supplemented
246.		Any and all Exhibits from the deposition(s) of Forest River Warranty Deponent, yet to be designated	To be supplemented
247.		Any and all Deposition Testimony of Corporate Representative of Forest River, Doug Gaeddert	To be supplemented
248.		Any and all Exhibits from the deposition(s) of Corporate Representative of Forest River, Doug Gaeddert	To be supplemented
249.		Any and all Deposition Testimony of any and/or all Corporate Representative of Forest River, yet to be designated	To be supplemented
250.		Any and all Exhibits from the deposition(s) of any and/or all Corporate Representative of Forest River, yet to be designated	To be supplemented
251.		Any and all documentation identified by defendant's experts in the preparation of their reports and/or testimony.	To be supplemented
252.		Any and all exhibits identified and/or used and/or relied upon by defendant's in the ongoing litigation of this matter.	To be supplemented
		Pricing costs for 32 BHLE	FOREST 0003171- FOREST 0003249
		32 BHLE Diagrams and Specs	FOREST 0003250- FOREST 0003299; FOREST 0003366- FOREST 0003391
		Lippert 32 BHLE Diagrams	FOREST 0003140;

			FOREST 0003344- FOREST 0003345; FOREST 0003351
		Any and all blueprints and design documents produced at deposition	To be supplemented
255.		Internal Forest River Memorandum regarding proposed production schedule	FOREST 0003294- FOREST 0003299
256.		September 1, 2005, NACS/FEMA Solicitation and Specifications	To be supplemented
257.		Handwritten designs, drawings, and notes for FEMA units	To be supplemented
258.		NACS/Forest River FEMA Specifications documents	To be supplemented
259.		2004 Email from NACS to Forest River regarding FEMA Trailer Production Specifications	To be supplemented
260.		November 2006 Elton Kiefer notes regarding Patrick and Adorn switching to LFE in early 2007	To be supplemented
261.		September 1, 2005 email Ty Miller to Doug Gaeddert and Tom Martin regarding California production	To be supplemented
		Deposition Transcript of Brian Deckle, NACS	P. 79-81
		Warranty Documents and Repair Documents	To be supplemented
		MSDS's	FOREST 0002609- FOREST 0002619
		Congressional Statement of Pete Liegl	To be supplemented
		September 1, 2005, Production Memorandum	FOREST 0003449
		Forest River's responses to Discovery Requests	To be supplemented
		Forest River Inspection Protocol	To be supplemented
		Forest River Testing Methodologies from Liberty (Operational Pressures)	FR-LTW-EXP06-006696
		Forest River Testing Methodologies from Liberty (Testing Methodologies)	FR-LTW-EXP06- 003857- FR-LTW-EXP06-003862
		Forest River Periodic Maintenance Chart	FR-LTW-EXP06-017924
		Liberty Handwritten notes starting 07/30/09	FR-LTW-EXP06- 004902- FR-LTW-EXP06-004920
		Liberty Schematics of Trailer	FR-LTW-EXP06-

			017166; FR-LTW-EXP06- 017925- FR-LTW-EXP06-017931
		Billing records of all Forest River Defense Experts	To be supplemented
		All photographs taken by Forest River and/or Forest River's Experts	To be supplemented
		Any document to be identified by Defendant Forest River in the ongoing discovery and deposition process	To be supplemented
		Any Forest River supplementation of any report and supplementing documents which may occur	To be supplemented
		Any and all Forest River demonstrative aids for trial to be exchanged at the appropriate time	To be supplemented
	<b>U.S.A.</b>		
262.		U.S.A. / FEMA Disaster File for Bobbi Wright and/or Lyndon Wright	FEMA 124-000001- FEMA 124-000078
263.		Affidavits of Robert James, Ph.D.	To be supplemented
264.		Curriculum Vitae of Robert James, Ph.D.	To be supplemented
265.		Reliance Materials and File of Robert James, Ph.D.	To be supplemented
266.		Any and all Deposition Testimony of Robert James, Ph.D.	To be supplemented
267.		Any and all Exhibits from the deposition(s) of Robert James, Ph.D.	To be supplemented
268.		Affidavits of Bruce Kelman, Ph.D.	To be supplemented
269.		Curriculum Vitae of Bruce Kelman, Ph.D.	To be supplemented
270.		Reliance Materials and File of Bruce Kelman, Ph.D.	To be supplemented
271.		Any and all Deposition Testimony of Bruce Kelman, Ph.D.	To be supplemented
272.		Any and all Exhibits from the deposition(s) of Bruce Kelman, Ph.D.	To be supplemented
273.		Affidavits of Michael Lindell, Ph.D.	To be supplemented
274.		Curriculum Vitae of Michael Lindell, Ph. D.	To be supplemented
275.		Reliance Materials and File of Michael Lindell, Ph.D.	To be supplemented
276.		Any and all Deposition Testimony of	To be supplemented

		Michael Lindell, Ph.D.	
277.		Any and all Exhibits from the deposition(s) of Michael Lindell, Ph.D.	To be supplemented
278.		Affidavits of Richard Monson, M.D., Sc.D.	To be supplemented
279.		Curriculum Vitae of Richard Monson, M.D., Sc.D.	To be supplemented
280.		Reliance Materials and File of Richard Monson, M.D., Sc.D.	To be supplemented
281.		Any and all Deposition Testimony of Richard Monson, M.D., Sc.D.	To be supplemented
282.		Any and all Exhibits from the deposition(s) of Richard Monson, M.D., Sc.D.	To be supplemented
283.		Affidavits of Mark Polk	To be supplemented
284.		Curriculum Vitae of Mark Polk	To be supplemented
285.		Reliance Materials and File of Mark Polk	To be supplemented
286.		Any and all Deposition Testimony of Mark Polk	To be supplemented
287.		Any and all Exhibits from the deposition(s) of Mark Polk	To be supplemented
288.		Affidavits of Coreen Robbins, M.H.S., Ph.D., C.I.H.	To be supplemented
289.		Curriculum Vitae of Coreen Robbins, M.H.S., Ph.D., C.I.H.	To be supplemented
290.		Reliance Materials and File of Coreen Robbins, M.H.S., Ph.D., C.I.H.	To be supplemented
291.		Any and all Deposition Testimony of Coreen Robbins, M.H.S., Ph.D., C.I.H.	To be supplemented
292.		Any and all Exhibits from the deposition(s) of Coreen Robbins, M.H.S., Ph.D., C.I.H.	To be supplemented
293.		Any and all Deposition Testimony of Dr. Christopher DeRosa	To be supplemented
294.		Any and all Exhibits from the deposition(s) of Dr. Christopher DeRosa	To be supplemented
295.		FEMA Storage Site Duties/Responsibilities regarding Forest River, Inc.	To be supplemented
296.		FEMA Model Travel Trailer Procurement Specifications dated 08-12-2004 (HSFE04-04-Q-800)	To be supplemented
297.		FEMA Accessible Model Travel Trailer	To be supplemented

		Procurement Specifications dated 04-21-2006 (with Accessible One Bedroom Travel Trailer Floor plan)	
298.		“Important Information for Travel Trailer Occupants” FEMA brochure	PSC002350 – PSC002351
299.		FEMA Model Travel Trailer Procurement Specifications Dated: July 14, 2005	PSC003049 – PSC003057
300.		Declaration of Kevin Souza, former Acting Deputy Director of Individual Assistance Division of FEMA	PSC003058 – PSC003065
301.		“FEMA Storage Site Duties/Responsibilities”	PSC003092 – PSC003094
302.		April 25, 2008 letter from FEMA to a THU occupant	PSC003397 – PSC003399
303.		Summary of Test Results conducted by Weston Solutions, Inc. for the U.S. EPA	PSC003407 – PSC003409
304.		Air Toxics, Ltd. Laboratory Narrative for samples submitted by Weston Solutions	PSC003410 – PSC003415
305.		FEMA test results for formaldehyde testing at FEMA THU staging areas during November 2005, December 2005, and January 2006	PSC003416 – PSC003420
306.		FEMA Memorandum from May 31, 2006 regarding Formaldehyde Air Sampling at the THU staging area in Purvis, Mississippi	PSC003421 – PSC003438
307.		Email correspondence between FEMA and Government staff	PSC003439 – PSC003447
308.		FEMA Job Hazard Analysis Worksheet	PSC023600
309.		FEMA Model Travel Trailer Procurement Specifications dated August 12, 2004	FOREST-0002503 – FOREST-0002508
310.		New FEMA Procurement Specifications dated April 11, 2008 Release Number HQ-08-056	PSC023601 – PSC023686
311.		FEMA Formaldehyde Timeline as of June 15, 2007	PSC023687 – PSC023689
312.		FEMA Timeline as of August 7, 2008 (From the deposition of Kevin Souza, FEMA Representative)	PSC023690 – PSC023702
313.		FEMA Procedure Storage Site Manual Fall 2005	To be supplemented

314.		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
315.		FEMA Myths & Facts: Travel Trailers- November 8, 2007	To be supplemented
316.		FEMA media release: Katrina/Rita Housing Facts-January 29, 2008	To be supplemented
317.		FEMA media release: FEMA’s Ongoing Response to Formaldehyde-February 12, 2008	To be supplemented
318.		FEMA media release: CDC Results of Formaldehyde Level Tests- February 14, 2008	To be supplemented
319.		FEMA media release: FEMA Plan of Action on Formaldehyde Findings to be Implemented Immediately-February 14, 2008	To be supplemented
320.		FEMA media release: FEMA Offering Formaldehyde Testing to Occupants of Trailers and Mobile Homes in Disasters Nationwide-February 22, 2008	To be supplemented
321.		FEMA media release: FAQ: 2008 Disaster Housing Plan – June 10, 2008	To be supplemented
322.		FEMA Statement on Formaldehyde – July 9, 2008	To be supplemented
323.		FEMA media release: Myths & Facts about FEMA Housing Following Katrina-May 26, 2008	To be supplemented
324.		FEMA media release: New Task Contract Awarded for Temporary Housing Units-August 4, 2008	To be supplemented
325.		FEMA media release: Frequently Asked Questions-October 27, 2008	To be supplemented
326.		FEMA media release: Initial Indoor Air Quality Tests Results-November 14, 2008	To be supplemented
327.		FEMA media release: FAQ National Disaster Housing Strategy – January 16, 2009	To be supplemented
328.		FEMA Statement on Travel Trailers and Formaldehyde	PSC023795
329.		Email from Christopher DeRosa to	PSC023796

		Howard Frumkin on February 27, 2007	
330.		Correspondence from Christopher DeRosa to Patrick Preston on February 27, 2007	PSC023797
331.		Email from Christopher DeRosa to Howard Frumkin and Thomas Sinks on March 9, 2007	PSC023798 – PSC023799
332.		Email from Christopher DeRosa to Mike Groutt on August 10, 2007	PSC023800
333.		Comments on Chronology of FEMA Trailers, drafted by Christopher DeRosa	PSC023801
334.		Correspondence from Christopher DeRosa to Howard Frumkin on September 21, 2007	PSC023802 – PSC023808
335.		Email from Thomas Sinks to All CDC on October 12, 2007	PSC023809
336.		NCEH/ATSDR Procedures regarding Official Interaction with Persons or organization outside of NCEH/ATSDR	PSC023810 – PSC023811
337.		Logbook of Joseph Little	To be supplemented
338.		Email from Patrick Preston to Scott Wright on November 30, 2005	To be supplemented
339.		Email from Scott Wright and Joseph Little to Richard Nikel, et al., on December 7, 2006	To be supplemented
340.		Correspondence between Barbara Rogers to Angela Davis and Sascha Fielding on March 21, 2007	To be supplemented
341.		Email of Mary Margaret Walker (FEMA-WAXMAN-7-26-07 Production – 485)	To be supplemented
342.		Correspondence From Mark Keim to Patrick Preston on March 17, 2007	To be supplemented
343.		Correspondence from Patrick Preston to Scott Wright on November 30, 2005	To be supplemented
344.		Email between Sam Coleman, Joseph Little and Scott Wright on December 1, 2006	PSC023819 – PSC023821
345.		Correspondence from Mark Keim to Patrick Preston on February 1, 2007	To be supplemented
346.		Email to and from Philip Allred on February 15, 2007	To be supplemented
347.		Email from Anne Sowell to Mark Bashor on August 8, 2007	To be supplemented

348.		Email between Patrick Preston and Margaret Ramos on February 27, 2007	To be supplemented
349.		Email between David Chawaga and Mary Margaret Walker on May 1, 2007	To be supplemented
350.		FEMA: Interim Direction on use of Temporary Housing Units (Revision Effective Date: March 10, 2008)	PSC023828 – PSC023834
.		FEMA: FEMA Begins Next Phase of Inventory Reduction of Excess Temporary Housing Units	To be supplemented
352.		“FEMA: Important Formaldehyde Information from FEMA Housing Occupants:	FEMA09-000388
353.		“FEMA Travel Trailer Requirements”	PSC0261671
354.		Any and all documents produced by Dr. Christopher DeRosa at his deposition, which will be taken/has been taken, or used as exhibits thereto	To be supplemented
355.		Flyer: “CDC will test Trailers and Mobile Homes for Formaldehyde for CDC Partners such as Community Organizations in Louisiana and Mississippi” dated December 2007	To be supplemented
356.		Script for Formaldehyde Concerns in Temporary Housing Unit: IA recipients with questions about formaldehyde, July 2007	To be supplemented
357.		Applicants Reporting MH/TT Formaldehyde Issues: IA recipients with questions about formaldehyde, July 2007	To be supplemented
358.		Lottie Travel Trailer (Receiving) Inspection Checklist	To be supplemented
359.		FEMA Brochure: “Important Information for Travel Trailer Occupants”	To be supplemented
360.		FEMA: Important Formaldehyde Information for FEMA Housing Occupants	To be supplemented
361.		Email from Martin McNeese dated October 11, 2006	To be supplemented
362.		Email from Curtis Melnick dated May 11, 2006	To be supplemented
363.		Memo from FEMA Temporary Housing Agent Group: Occupants with questions	To be supplemented

		about Formaldehyde regarding Formaldehyde-Help-line Calls, Referrals and Transfers dated July 2007	
364.		FEMA Internal documents regarding formaldehyde	To be supplemented
365.		Emails regarding Katrina and Rita housing estimates dated November 1, 2005	To be supplemented
366.		Assessment of health Complaints among Pediatric Residents of FEMA-Supplied Trailers and Mobile Homes in Hancock County, Mississippi (Exhibit from the deposition of Michael Lapinski)	Lapinski Exhibit 17
367.		Fact Sheet: Assessment of Health Complaints Among Children Living in FEMA Temporary Housing Units in Hancock county, Mississippi (Exhibit from the deposition of Michael Lapinski)	Lapinski Exhibit 16
		Emails re: Formaldehyde	To be supplemented
		Formaldehyde Flyer	To be supplemented
		Request for Proposal re: Travel Trailers	FR 3522
368.		Any and all documentation and/or exhibits identified by defendant's experts and/or fact witness in the preparation of their reports and/or testimony.	To be supplemented
369.		Any and all exhibits identified and/or used and/or relied upon by defendant's in the ongoing litigation of this matter.	To be supplemented
		Billing records of all USA / FEMA Defense Experts	To be supplemented
		Any photographs taken by USA / FEMA and/or USA / FEMA defense experts	To be supplemented
		Any document to be identified by Defendant USA / FEMA in the ongoing discovery and deposition process	To be supplemented
		Any USA / FEMA supplementation of any report and supplementing documents which may occur	To be supplemented
		Any and all USA / FEMA demonstrative aids for trial to be exchanged at the appropriate time	To be supplemented
	<b>Shaw</b>		

	<b>Environmental</b>		
370.		Any and all Class certification Shaw Environmental deposition testimony	To be supplemented
371.		Any and all Class certification Shaw Environmental deposition exhibits / documents produced	To be supplemented
372.		Shaw Environmental unit file on Lyndon Wright trailer	SHAW WRI-00001- SHAW WRI-00017
		Entergy Orleans Meter Data	SHAW-WRI 00051
		Shaw Standard Operating Procedure Trailer Processing and Yard Inspection dated 2/1/06	SHAW 013564- SHAW 013568
		CH2M Hill, Inc., FEMA Trailer User's Guide	SHAW 013523- SHAW 013538
373.		Shaw / FEMA contract	To be supplemented
		IA / TAC Contract	SHAW 001890- SHAW 002019
		FEMA Request for Proposal Contract HSFHQ-05-0573	SHAW 000373 SHAW 000578
		Checklists / PMI form	SHAW 013303
		Picture of Installed Trailer	SHAW 002517
		TT/MH QC Construction Issues/Maint Issues Sheet	SHAW 002363- SHAW 002364
		Shaw Code emails and communications	To be supplemented
		Orleans Parish Motion	SHAW 002099- SHAW 003912
		Kenner Ordinance	SHAW 003932- SHAW 003934
		Gretna & Westwego Ordinance	SHAW 003930- SHAW 003931
		Communications with Subs re: implementation of Emergency Housing Contract (to be identified)	To be supplemented
		C. Martin Documents (and other transfer documents)	SHAW 000042- SHAW 000051; LW-CMC-000001- LW-CMC-000071
		Crown Roofing Services Documents	CROWN 000001- CROWN 000016
		July 19, 2006 Work Plan	SHAW 000669- SHAW 000700
		Pier Construction	SHAW 002416
		Shaw Emails relating to Formaldehyde	SHAW 013510;

			SHAW 013511- SHAW 013512; SHAW 013513- SHAW 013514; SHAW 013515- SHAW013516; SHAW 013517- SHAW 013518; SHAW 013519- SHAW 013520; SHAW 013521- SHAW 013522; SHAW 013539- SHAW 013545; SHAW 013546- SHAW 013547; SHAW 013548- SHAW 013549; SHAW 013554; SHAW 013555- SHAW 013556; SHAW 013557; SHAW 013558- SHAW 013559; SHAW 013560- SHAW 013562
		Shaw Email: Burgess to Goetz, 10/18/05 9:51 a.m.	SHAW 002257- SHAW 002259
		Shaw Email: Burgess to Goetz, 10/18/05 2:48 p.m.	SHAW 002260- SHAW 002263
		Shaw Email: Miller to Burgess, 11/29/05	SHAW 003145- SHAW 003147
		Shaw Email: Miller to Burgess, 11/22/05	SHAW 003058
		Shaw Email: Black to Janz, 11/11/05	SHAW 002773- SHAW 002796
		Shaw Email: Neal to Janz, 02/03/06	SHAW 005015- SHAW 005016
		Shaw Email: Orris to Brixius, 10/19/05	SHAW 002302- SHAW 002303
		Shaw Email: Janz to Smiley, 07/06/06	SHAW 011024- SHAW 011025
		Shaw Policies and Clarifications	SHAW 002726- SHAW 002727

		Shaw Group Suggested Call Center Questionnaire	SHAW 013236- SHAW 013237
		Haul & Install Call Center Questionnaire	SHAW 013238- SHAW 013240
		Do Not Lease Document	SHAW 003267
		Shaw Task Order 05-0006 Site Identification	SHAW 000601- SHAW 000615
		Shaw Task Order No. 014 Trailer Transportation	SHAW 000631- SHAW 000632
		Final Draft Work Order, March 19, 2006	SHAW 000900- SHAW 000939
		Final Group Site Work Plan, April 2006	SHAW 000952- SHAW 000992
		June 8, 2006, Work Plan	SHAW 000746- SHAW 000786
		June 14, 2006 City Park Trailer Park	SHAW 001054- SHAW 001089
		Final Work Order on Group Sites, June 26, 2006	SHAW 001102- SHAW 001142
		Shaw Inspection Protocol (2 pages)	To be supplemented
		Demobilization Documents	SHAW 002316- SHAW 002317
374.		All FEMA task orders to Shaw Environmental	To be supplemented
375.		All FEMA extension of time orders to Shaw Environmental	To be supplemented
		All formaldehyde emails and documents	To be supplemented
		RCG Contract Documents	To be supplemented
376.		All FEMA Amendments or Modifications to Shaw Environmental contract	To be supplemented
377.		All Shaw Environmental work plans produced to Plaintiff	To be supplemented
378.		Subcontractor agreement with installer of Wright unit	To be supplemented
379.		Affidavits of John D. Oстераas	To be supplemented
380.		Curriculum Vitae of John D. Oстераas	To be supplemented
381.		Reliance Materials and File of John D. Oстераas	To be supplemented
382.		Any and all Deposition Testimony of John D. Oстераas	To be supplemented
383.		Any and all Exhibits from the deposition(s) of John D. Oстераas	To be supplemented
384.		Any and all Deposition Testimony of	To be supplemented

		Corporate Representative of Shaw Environmental, yet to be designated	
385.		Any and all Exhibits from the deposition(s) of Corporate Representative of Shaw Environmental, yet to be designated	To be supplemented
386.		Any and all Deposition Testimony of Project Manager of Shaw Environmental, yet to be designated	To be supplemented
387.		Any and all Exhibits from the deposition(s) of Project Manager of Shaw Environmental, yet to be designated	To be supplemented
388.		Any and all additional documents not yet produced in this matter	To be supplemented
389.		Any and all documentation and/or exhibits identified by defendant's experts and/or fact witness in the preparation of their reports and/or testimony.	To be supplemented
390.		Any and all exhibits identified and/or used and/or relied upon by defendant's in the ongoing litigation of this matter.	To be supplemented
		Billing records of all Shaw Environmental Defense Experts	To be supplemented
		Any photographs taken by Shaw Environmental and/or Shaw Environmental defense experts	To be supplemented
		Any Shaw Environmental supplementation of any report and supplementing documents which may occur	To be supplemented
		Any document to be identified by Defendant Shaw Environmental in the ongoing discovery and deposition process	To be supplemented
		Any and all Shaw Environmental demonstrative aids for trial to be exchanged at the appropriate time	To be supplemented
	<b>Wright Unit</b>		
391.		Photographs taken by or in the possession of Wright of the Forest River, Inc., unit	To be supplemented
		Photographs of Lyndon Wright with	To be supplemented

		Trailer	
392.		Any and all labels or stickers on the Forest River, Inc., unit occupied by Lyndon Wright	To be supplemented
		Billing records of all Shaw Environmental Defense Experts	To be supplemented
		All photographs taken by Shaw Environmental	To be supplemented
	<b>Wright File</b>		
393.		Photographs of Lyndon Wright regarding skin conditions	To be supplemented
394.		Lyndon Wright Financial Records	To be supplemented
395.		Lyndon Wright Employment Records	To be supplemented
		Employment Records from the City of New Orleans related to Lyndon Wright	LW-CITY NO00001-00256
		Attendance Records from City of New Orleans and Hyatt New Orleans relating to Lyndon Wright	LW-CITY NO 00001-00256 & LW-HYATT00001-00126
		Lyndon Wright Original Complaint	To be supplemented
		Lyndon Wright Amended Complaint	To be supplemented
		Lyndon Wright Plaintiff Fact Sheet	To be supplemented
		Lyndon Wright Amended Plaintiff Fact Sheet	To be supplemented
	<b>Medical Records</b>		
396.		Medical Records from Dr. Farber, Kenner Dermatology / Gulf South Medical and Surgical Institute regarding Lyndon Wright	LWFR-EXP2-000021-LWFR-EXP2-000052
		Photographs of Lyndon Wright from the records of Kenner Dermatology	LWFR-EXP2-000010-LWFR-EXP2-000020
		Medical Records from East Jefferson General Hospital regarding Lyndon Wright	LWFR-EXP15-000518-LWFR-EXP15-000522; LW-EJGH0001-LW-EJGH00041
397.		Medical Records from Dr. Worley regarding Lyndon Wright	LWFR-EXP14-000255-LWFR-EXP14-000256
398.		Medical Records from Uptown Nephrology regarding Lyndon Wright	LWFW-EXP14-000085-LWFW-EXP14-000254
399.		Medical Records from Dr. Richard Spector regarding Lyndon Wright	LWFR-EXP14-000008-LWFR-EXP14-000084
		Medical Records from Dr. Kenneth Smith regarding Lyndon Wright	LTW-EXP07-000250 LTW-EXP07-000291
		Medical Records of Dr. H. James	To be supplemented

		Wedner	
		Touro Medical Records	LWFR-EXP12-000040- LWFR-EXP12-000046; LWFR-EXP12-000150- LWFR-EXP12-000153 LWFR-EXP12-000289- LWFR-EXP12-000312; LWFR-EXP12-000512- LWFR-EXP12-000519
		Dr. Shwery administered psychological testing data	FR-LTW-EXP08- 002224- FR-LTW-EXP08-002258
		Dr. Thompson / Dr. Manguno-Mire psychological testing	To be supplemented
		Report of Gina Manguno-Mire	FR-LTW-EXP08- 002259- FR-LTW-EXP08-002261
400.		Rite Aid Pharmacy Records regarding Lyndon Wright	LWFR-EXP12-000279- LWFR-EXP12-000286
		Walgreens Pharmacy Records regarding Lyndon Wright	LWFR-EXP12-000485- LWFR-EXP12-000509
	<b>Others</b>		
		Demonstrative wood panels removed from the Lyndon Wright Trailer	To be supplemented
		Demonstrative Samples of No Formaldehyde Added wood composite products	To be supplemented
401.		Any and all Deposition Testimony of Representative of NACS, yet to be designated	To be supplemented
402.		Any and all Exhibits from the deposition(s) of Representative of NACS, yet to be designated	To be supplemented
403.		Any and all Deposition Testimony of Representative of RVIA, yet to be designated	To be supplemented
404.		Any and all Exhibits from the deposition(s) of Representative of RVIA, yet to be designated	To be supplemented
		Any and all Deposition Testimony of Representative of Lippert Components, yet to be designated	To be supplemented
		Any and all Exhibits from the deposition(s) of Representative of	To be supplemented

		Lippert Components, yet to be designated	
		Any and all Deposition Testimony of Representative of RCG Enterprises, yet to be designated	To be supplemented
		Any and all Exhibits from the deposition(s) of Representative of RCG Enterprises, yet to be designated	To be supplemented
		Louisiana State Board of Medical Examiners Temporary Permit Qualifications/Instructions	PSC026167 – PSC026172
		BlueLinx Corporation: Material Safety Data Sheet for urea Formaldehyde Bonded Wood Products	PSC003068 – PSC003078
		Georgia-Pacific: Material Safety Data Sheet for Urea Formaldehyde Bonded Wood Products	PSC003079 – PSC003091
		Louisiana Pacific: Material Safety Data Sheet for Urea Formaldehyde Bonded Panel Products	FLE00006354
		Lippert Component Frame Design for 32BHLE units	To be supplemented
		Georgia Pacific: Material Safety Data Sheet #30 for UF Bonded Wood Products	GAPAC-000001 – GAPAC-000006
		Georgia Pacific: Material Safety Data Sheet #31 for Wood and Wood Products	GAPAC-000007 – GAPAC-000011
		Manufactured Home Decking Labels from Georgia Pacific	GAPAC-000012 – GAPAC-000014
		City of New Orleans Environmental testing results and report responsive to Forest River, Inc., subpoena	To be supplemented
		Any photographs and/or videos taken by Scott Johnson of the Testing of the Forest River Unit	To be supplemented
		Any and all documentation and/or exhibits identified by defendant's experts and/or fact witness in the preparation of their reports and/or testimony.	To be supplemented
		Any document necessary for rebuttal	To be supplemented
		Any and all exhibits and/or documents identified and/or used and/or relied upon by defendant's in the ongoing litigation	To be supplemented

		of this matter.	
		Any and all deposition testimony and/or documents or exhibits introduced at any deposition of plaintiff's and/or defendants' experts	To be supplemented
		Any and all plaintiff and/or defendants expert reports, both preliminary and final, submitted and anticipated to be submitted including all reliance materials.	To be supplemented

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

RESPECTFULLY SUBMITTED:  
**FRANK J. D'AMICO, JR., APLC**

BY: s/Frank J. D' Amico, Jr.  
FRANK J. D'AMICO, JR., T.A. (#17519)  
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**CERTIFICATE OF SERVICE**

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

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