

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

IN RE: FEMA TRAILER	*	MDL NO. 07-1873
FORMALDEHYDE PRODUCTS	*	
LIABILITY LITIGATION	*	SECTION N(5)
	*	
	*	JUDGE ENGELHARDT
THIS DOCUMENT RELATES TO:	*	
<i>Lyndon Wright v. Forest River, Inc., et al.</i>	*	MAGISTRATE CHASEZ
No. 09-2977 (E.D. La.)	*	
	*	

SHAW ENVIRONMENTAL, INC.’S PRELIMINARY EXHIBIT LIST

NOW INTO COURT, through undersigned counsel, comes Shaw Environmental, Inc. (“Shaw”), and pursuant to the Court’s Trial Scheduling Order [Doc. No. 2716] hereby submits the following preliminary exhibit list:

EXHIBIT #	EXHIBIT DESCRIPTION
1.	The Individual Assistance / Technical Assistance Contract (“IA/TAC”) between FEMA and Shaw Environmental, Inc. [Contract No. HSFEHQ-05-D-0573] including all Task Orders, Amendments, Attachments, Statements of Work, and Work Plans [SHAW 000373–001142]
2.	All records of any Maintenance and Deactivation Contractor (“MDC”) responsible for maintenance and/or deactivation of the Wright unit after June 1, 2006.
3.	All records relating to the deactivation of the Wright Unit.
4.	Lyndon Wright’s Plaintiff Fact Sheets
5.	Bobbie Wright’s Individual Assistance file [FGC009-000012–000089]

6.	All photographs of the property located at 2315 Seminole Lane from August 2005 to the present.
7.	Shaw's Trailer File regarding the Wright Unit [SHAW-WRI 00001-00014]
8.	Shaw's Maintenance File regarding the Wright Unit [SHAW-WRI 00015-00017]
9.	Shaw's Haul and Install Applicant Information Sheet on the Wright Unit
10.	Shaw's Site Assessment Packet for 2315 Seminole Lane
11.	FEMA's Temporary Housing Unit Inspection Report
12.	Redacted spreadsheet titled Shaw/FEMA Travel Trailers Leaving FEMA Yard
13.	Redacted spreadsheet titled Manhattan Site Trailer Delivery List
14.	Unit Delivery Ticket for the Wright Unit
15.	Redacted spreadsheet titled AFO DHOPS Master Expedite List dated 03/31/2006
16.	RCG Enterprises Inc. redacted invoices reflecting charges for the hauling and installation of the Wright Unit.
17.	Email dated June 1, 2006, from Robyn Williams reflecting that all trailers assigned to C. Martin Company, Inc. had been accepted, and attached redacted spreadsheet.
18.	Preventive Maintenance Inspection Form dated June 1, 2006, reflecting acceptance of Wright Unit by C. Martin Company, Inc.
19.	Redacted FEMA spreadsheet reflecting Bar Code History [FGC041-000001]
20.	Redacted FEMA spreadsheets regarding the Wright Unit [FGC041-000004-000008]
21.	FRRATS Screens for Bobbie Wright's Disaster Files [FEMA10-002283-002332]
22.	Melville Travel Trailer Inspection Checklist and attached Reports [FGC009-000001-000011]
23.	Photographs taken by FEMA on July 30, 2009, of the Wright Unit in Melville, LA [FEMA165-0000001-0000012]

24.	Documents collected by FEMA on July 30, 2009, from within the Wright Unit in Melville, LA [FEMA165-0000013-0000187]
25.	Forest River, Inc. documents relating to the Wright Unit [FOREST-0151924-0151946]
26.	The Work Agreement between Shaw and RCG Enterprises, Inc. [SHAW 000285-000294]
27.	Purchase Orders and related documentation regarding work under the IA-TAC subcontracted by Shaw to RCG Enterprises, Inc.
28.	The Work Agreement between Shaw and Thompson Engineering, Inc.
29.	Purchase Orders and related documentation regarding work under the IA-TAC subcontracted by Shaw to Thompson Engineering, Inc.
30.	The Work Agreement between Shaw and Pinnacle Transportation Systems, Inc.
31.	Purchase Orders and related documentation regarding work under the IA-TAC subcontracted by Shaw to Pinnacle Transportation Systems, Inc.
32.	The Work Agreement between Shaw and Keta Group, LLC [SHAW 000215-000224]
33.	Purchase Orders and related documentation regarding work under the IA-TAC subcontracted by Shaw to Keta Group, LLC
34.	Examples of Shaw/subcontractor production reports
35.	Examples of Shaw quality control reports
36.	Examples of Shaw reports and briefings related to Task Order 15 of the IA/TAC (haul and install work)
37.	FEMA Trailer Inspections Field Inspector's Guide
38.	All communications, whether by letter, memorandum, email or otherwise, between Shaw and FEMA relating to the IA/TAC.
39.	All documents produced by plaintiff, PSC, FEMA, Forest River, and any third party in this proceeding.
40.	All documents contained in the reliance files of any expert designated by any party to this proceeding.

41.	Curriculum vitae of any expert designated by any party to this proceeding.
42.	All photographs and videos taken of the Wright Unit by or on behalf of any party or expert.
43.	All documents relating to any testing performed on the Wright Unit by or on behalf of any party or expert.
44.	John D. Osteraas, Ph.D., P.E., Exponent, Engineering Investigation – Lyndon Wright Trailer, Errata dated 11/17/09, and all documents referenced therein.
45.	All medical records related to Lyndon Wright, including all clinical summaries, office encounters, emergency room records, inpatient records, outpatient records, surgical notes or reports, laboratory tests, x-rays, radiology exams, etc.
46.	Pharmacy records related to Lyndon Wright.
47.	Documents and records from the Internal Revenue Service related to Lyndon Wright.
48.	Documents and records from the Social Security Administration related to Lyndon Wright.
49.	Employment records from the City of New Orleans related to Lyndon Wright.
50.	All documents produced in response to the subpoena duces tecum served on The City of New Orleans.
51.	All documents produced in response to the subpoenas duces tecum served on the Hyatt Corporation, Hyatt HOC, Hyatt Louisiana, SHC New Orleans, and/or a related Hyatt entity.
52.	All documents produced in response to the subpoena duces tecum served on Poydras Properties Hotel Holdings.
53.	All documents produced in response to the subpoena duces tecum served on Clifford E. Cardone.
54.	All documents produced in response to the subpoena duces tecum served on C. Martin Company, Inc.
55.	All documents produced in response to the subpoena duces tecum served on Riverside Court Condos.
56.	All documents produced in response to the subpoena duces tecum served on Riverland Credit Union.

57.	All documents produced in response to the subpoena duces tecum served on A.M.E. Services.
58.	All documents produced in response to the subpoena duces tecum served on Crown Roofing Services.
59.	All documents produced in response to the subpoena duces tecum served on J.P. Morgan Chase.
60.	All documents produced in response to the subpoena duces tecum served on Materials Management Group, Inc.
61.	All documents produced in response to the subpoena duces tecum served on Orleans Parish School Board.
62.	All documents produced in response to any subpoena duces tecum served in this litigation.
63.	All diagrams and schematics of the Wright Unit Model.
64.	All documents produced by Shaw Environmental, Inc.
65.	All relevant, non-privileged documents contained in Shaw's files, as well as any document still under review to respond to outstanding discovery from plaintiffs and in order to prepare Shaw's defense; document recovery and review is incomplete and continuing.
66.	All documents produced or exchanged in this MDL proceeding [07-md-1873, including all related case].
67.	All documents referenced, described or identified in any discovery responses of any party to this MDL proceeding.
68.	All exhibits to every deposition taken in this MDL proceeding.
69.	All documents entered as exhibits in any hearing or trial in this MDL proceeding, including the hearing on Plaintiffs' Motion for Class Certification and the Alexander/Cooper bellwether trial.
70.	All documents identified by any witness in any deposition, hearing or bellwether trial in this MDL proceeding.
71.	All documents attached as an exhibit to any pleading filed in this MDL proceeding.
72.	All documents needed for rebuttal purposes.

73.	All exhibits listed by any other party to this litigation.
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As both fact and expert discovery is ongoing, Shaw respectfully reserves the right to supplement and amend this preliminary exhibit list once discovery in this matter is completed.

Respectfully submitted,

**BAKER DONELSON BEARMAN
CALDWELL & BERKOWITZ, PC**

/s/ M. David Kurtz

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**ATTORNEYS FOR DEFENDANT,
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CERTIFICATE OF SERVICE

I hereby certify that on this the 30th day of November, 2009, I electronically filed the foregoing pleading using the Court's CM/ECF system, which sent notification of such filing to all court-appointed liaison counsel and counsel of record who are CM/ECF participants.

/s/ M. David Kurtz

M. DAVID KURTZ