

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

IN RE: FEMA TRAILER
FORMALDEHYDE PRODUCTS
LIABILITY LITIGATION

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

THIS DOCUMENT IS RELATED TO

*Charlie Age, et al v. Gulf Stream Coach
Inc., et al*, Docket No. 09-2892;
Alana Alexander, individually and on behalf of
Christopher Cooper

* * * * *

PRETRIAL ORDER

1. **PRETRIAL CONFERENCE**

A Pretrial Conference in this matter occurred on September 3, 2009 at 8:30 a.m.

2. **APPEARANCE OF COUNSEL**

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On Behalf of Fluor Enterprises, Inc.

3. **REPRESENTED PARTIES**

A. Plaintiff Alana Alexander, individually and on behalf of her son, Christopher Cooper. Residents of Orleans Parish, Louisiana.

B. Defendant Gulf Stream Coach, Inc., is an Indiana corporation, with an Indiana principal place of business. Gulf Stream Coach is a manufacturer of RVs. In 2004, as a result of four hurricanes striking Florida, FEMA ordered travel trailers as temporary housing for individuals whose residences were rendered uninhabitable from one of the four hurricanes. Gulf Stream Coach built travel trailers which were sold by a distributor to FEMA. The Alexander Unit was completed in December 2004 and sold to Best Buy RV, a non-party, who in turn sold the unit to FEMA.

C. Defendant Fluor Enterprises, Inc., is a California corporation, with its principal place of business in a place other than Louisiana. Defendant Fluor Enterprises, Inc. is an engineering, procurement and construction management firm. Prior to Hurricane Katrina

making landfall in Louisiana and Mississippi FEMA awarded FEI an Individual Assistance-Technical Assistance Contract. Pursuant to Task Orders issued by FEMA following landfall of Hurricanes Katrina and Rita, FEI, among many other services, provided staging, hauling and installing, maintenance and deactivation services with respect to various types of emergency housing units that FEMA selected and chose to use to temporarily house displaced citizens. FEI retained a number of subcontractors who performed the actual hauling and installing services.

D. There are no issues of misjoinder or nonjoinder of parties.

4. JURISDICTION

In her complaint, Plaintiff identified 28 U.S.C. §§ 1332 (diversity), 1346/2671 (government defendant/federal officer) and 1367(a) (supplemental jurisdiction) as the bases for federal jurisdiction.

Plaintiff has recently dismissed FEMA as a defendant, however, asserts that diversity jurisdiction remains, as Plaintiff, on behalf of herself and her child, seeks damages in excess of \$75,000.00 and there is complete diversity among the parties.

Defendants contend that federal question and CAFA's Mass Action provisions also provide the basis of federal jurisdiction.

5. PENDING MOTIONS

As of September 4, 2009 at 2:45 p.m., the following motions remain outstanding.

A. Gulf Stream Coach Inc.'s Motion for Summary Judgment regarding immunity from state law tort immunity (government contractor defense) filed on July 31, 2009 (Document No. 2410).

B. Gulf Stream Coach Inc.'s Motion for Partial Summary Judgment regarding Plaintiff's inadequate warning claims under the LPLA filed August 17, 2009 (Document No.

2719).

C. Fluor Enterprises, Inc.'s Motion for Partial Summary Judgment regarding claims under the LPLA filed August 18, 2009 (Document No. 2743).

D. Gulf Stream Coach Inc.'s Motion *in Limine* to Exclude Expert Testimony of James P. Kornberg, M.D., SC. D. filed on August 19, 2009 (Document No. 2769).

E. Gulf Stream Coach Inc.'s Motion to Strike Opinions and Testimony of Ervin Ritter, P.E. filed on August 20, 2009 (Document No. 2777).

F. Gulf Stream Coach Inc.'s Motion to Exclude the Testimony of Alexis Mallet, Jr. filed on August 20, 2009 (Document No. 2776).

G. Gulf Stream Coach Inc.'s Motion *in Limine* to Exclude Testimony of Paul Hewett filed on August 24, 2009 (Document No. 2792).

H. Gulf Stream Coach Inc.'s Motion *in Limine* to Limit the Testimony of Travis Allen, Heath Allen and Gerald Paul Blanchard filed on August 25, 2009 (Document No. 2819).

I. Fluor Enterprises, Inc.'s Motion for Summary Judgment Based on the Government Contractor Defense (Document No. 2802).

J. Fluor Enterprises, Inc.'s Motion to Exclude the Expert Testimony of Charles David Moore, PE, PLS (Document No. 2899).

K. Gulf Stream Coach, Inc.'s Motion *in Limine* to Prohibit Any Testimony or Evidence Relating to the Testing of Other Emergency Housing Units (Document No. 2821).

L. Gulf Stream Coach, Inc.'s Motion *in Limine* to Exclude Testimony of Dr. McGwin and to Exclude Evidence of Irrelevant Medical Conditions and to Exclude Any Reference to Cancer (Document No. 2824).

M. Gulf Stream Coach, Inc.'s Motion *in Limine* to Exclude Expert Testimony of

Patricia M. Williams, Ph.D., DABT (Document No. 2834).

N. Gulf Stream Coach, Inc.'s Motion *in Limine* to Exclude Certain Witness Testimony (Document No. 2836).

O. Gulf Stream Coach, Inc.'s Motion *in Limine* to Exclude Expert Testimony of Christopher De Rosa, Ph.D. (Document No. 2872).

P. Gulf Stream Coach, Inc.'s Motion to Strike Opinions and Testimony of Paul LaGrange (Document No. 2879).

Q. Gulf Stream Coach, Inc.'s Motion *in Limine* to Exclude Evidence of Certain Formaldehyde Screening Devices (Document No. 2881).

R. Fluor Enterprises, Inc.'s Motion *in Limine* to Exclude Certain Fact Testimony of Plaintiffs and Fact Witnesses (Document No. 2885).

S. Gulf Stream Coach, Inc.'s Motion *in Limine* to Prohibit Plaintiffs' Reference To or Introduction of Evidence Regarding Unreasonable and Subsequently Passed Ambient Air Standards (Document No. 2887).

T. Gulf Stream Coach, Inc.'s Motion *in Limine* to Limit Expert Testimony of Janet Barnes, M.D. (Document No. 2891).

U. Gulf Stream Coach, Inc.'s Motion *in Limine* to Exclude the Opinions of Mary DeVany (Document No. 2895).

V. Plaintiff's Motion to Certify for Interlocutory Review Pursuant to 28 U.S.C. §1292(b) the Court's August 21, 2009 Order Dismissing the FTCA Claims of Christopher Cooper for Lack of Subject Matter Jurisdiction (Document No. 2923).

6. **BRIEF SUMMARY OF MATERIAL FACTS**

A. PLAINTIFF'S SUMMARY OF THE FACTS

Plaintiff and her minor son Christopher Cooper were displaced from their permanent home as a result of Hurricane Katrina. Since their home was rendered uninhabitable, Plaintiff and her son were deemed eligible to receive emergency housing assistance from FEMA.

The housing assistance provided to Plaintiff and her son was in the form of a travel trailer manufactured by Defendant Gulf Stream on or about December 13, 2004, with Vehicle Identification Number (VIN) 1NL1GTR2551021783. This unit constitutes a product under the Louisiana Products Liability Act ("LPLA"). Plaintiff and her son began living in the travel trailer on or about May 27, 2006 and resided continuously in the unit until on or about December 30, 2007. Plaintiff and her son vacated the travel trailer within a month after Plaintiff first became aware of the potential dangers of formaldehyde exposure in the trailer.

Gulf Stream has a duty to warn Plaintiff and her family about the dangers and risks of formaldehyde in the travel trailer; this duty was continuing in nature, and legally was owed to Plaintiff by Gulf Stream during the entire period that Plaintiff and her family occupied this travel trailer. The exposure to Plaintiff and her son to formaldehyde fumes from the travel trailer resulted from the normal, foreseeable, and intended use of the travel trailer, without substantial alteration in the condition in which Gulf Stream sold the travel trailer. The design of the travel trailer, including the use of plywood, press board, other composite wood products and other products that contain formaldehyde, is defective and posed an unreasonable risk of harm to Plaintiff and her son. The use of plywood, press board, other composite wood products and other products that contain formaldehyde constitute a defect in comparison or manufacture that posed an unreasonable risk of harm to Plaintiff and her son. Gulf Stream's travel trailer was in a

defective condition and was unreasonably dangerous under normal use at the time the travel trailer left Gulf Stream's control. Plaintiff and her son were intended and foreseeable users of the travel trailer, and the damages and losses to Plaintiff and her son reasonably could have been anticipated by Gulf Stream.

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

(1) in failing to design the travel trailer so as not to emit dangerous levels of formaldehyde;

(2) in providing a travel trailer which, by virtue of its design and/or manufacture and/or composition, was unreasonably dangerous under reasonably anticipated use;

(3) in providing a travel trailer which, by virtue of a lack of an adequate warning(s), was unreasonably dangerous under reasonably anticipated use;

(4) in providing a travel trailer which did not conform to the express warranties made by Gulf Stream regarding its fitness for use or reasonably anticipated¹;

(5) in failing to properly test the travel trailer to properly evaluate the levels of emissions of formaldehyde under foreseeable conditions for extended periods of time;

(6) in failing to adhere to any and all express warranties of fitness and safety for the travel trailer it manufactured and provided.

The travel trailer was installed on Plaintiff's home site and hooked to utilities, etc. for residential purposes by Defendant Fluor, pursuant to a contract between Fluor and FEMA. Fluor installed the travel trailer unit by "blocking" the unit. Fluor is also a "manufacturer" under the LPLA. By blocking the trailer, and in the process of jacking the trailer, Fluor created stress and

¹ The Court has dismissed Plaintiff's express warranty claims. (Docket Entry Number 2764).

flexing on the frame of the unit, as it was not designed to be lifted off of the wheel base. Such stress and flexing created distortion of the trailer's shell allowing water moisture and air intrusion, which contributed to increased formaldehyde exposures. Fluor knew of problems with chemical emissions in travel trailers it was installing, but took no action to protect residents.

On behalf of herself and her minor son, Plaintiff seeks compensatory damages for: physical pain and suffering; mental anguish and emotional distress; the past, continuing and future medical expenses; the aggravation of Plaintiff's minor son's preexisting respiratory conditions; the impairment of future wage-earning capacity and/or daily life activities suffered and to be suffered by Plaintiff's minor son; and, Plaintiff's loss of consortium based upon the injuries suffered by her minor son.

B. DEFENDANT GULF STREAM COACH INC.'S SUMMARY OF THE FACTS

On May 26, 2006, Alana Alexander and Christopher Cooper moved into a travel trailer provided by FEMA as part of its response to the hurricanes Katrina and Rita disasters. Gulf Stream Coach, Inc. constructed the trailer in question in December 2004. The unit was initially purchased in response to the four hurricanes that struck Florida in 2004. Nevertheless, it was not used for that disaster. Instead, FEMA kept the unit and provided it to Alexander/Cooper in 2006. Prior to providing the unit to Alexander/Cooper, FEMA inspected it and cleared it for use. The unit was set up by a sub-contractor of Fluor on the property at 4415 Dale Street in New Orleans East. That is the site address of the former Alexander/Cooper house which flooded on August 29, 2005. Prior to moving in, Ms. Alexander was instructed to air out and ventilate the unit by the Fluor sub-contractor, which she routinely did while living in the trailer. Ms. Alexander vacated the travel trailer in late December 2007.

Ms. Alexander claims that she suffered eye, nose and throat irritation for several weeks

after moving into the trailer which she attributes to formaldehyde exposure. No doctor has examined her and reached that conclusion. No expert retained by her attorneys has opined that she has or had a formaldehyde-related injury. Christopher Cooper, born in December 1996, was 8 1/2 years old when hurricane Katrina struck New Orleans. He had previously been diagnosed with moderate to severe asthma since the age of 2-3 years. He used Albuterol and a nebulizer (breathing machine) and visited the Emergency Room several times per year prior to August 2005. After the evacuation, his family resided in Florida until moving into the trailer in May 2006. He saw a doctor for his asthma in Florida. He next saw a doctor in October 2007. At that time he had allergic conjunctivitis in his eyes and he refilled his Albuterol. He next saw a doctor on December 2, 2007, when he went to the emergency room for an asthma attack. There, he reported that he had not had an attack in the past 12 months. The family moved out of the trailer in late December 2007. A doctor next saw him in April 2008 for allergic conjunctivitis in his eyes.

The Alexander unit was built in December 2004, at Gulf Stream's plant 57. It was shipped to a staging area in Florida. Thereafter it was transferred to Louisiana and sat on Dow's property until 2006. It was then moved to the Six Flags staging area in 2006 where it was again inspected. In February 2006, it was set up at the Dale Street address where it sat until Alexander/Cooper moved in on May 26, 2006. Alexander/Cooper moved out of the trailer in late-December 2007, and closed up the unit completely. On January 28-29, 2008, W.D.Scott's group, who had been employed by the Plaintiff, tested the unit without airing it out. The testing resulted in an ambient air concentration of formaldehyde of 0.050 parts per million (ppm).

C. DEFENDANT FLUOR ENTERPRISES INC.'S SUMMARY OF THE FACTS

Under the Stafford Act, FEMA provides services citizens following natural disasters.

As of 2004, FEMA did not utilize the private sector in connection with its individual assistance programs. Rather, those functions were handled by a FEMA group known as the Disaster Housing Program, using the U.S. Army Corps of Engineers for technical assistance.

By July 2005, with Hurricane Dennis bearing down on Florida, FEMA requested a formal proposal from FEI for an Individual Assistance-Technical Assistance Contract (IA-TAC) to assist FEMA in its individual assistance mission. FEI submitted a proposal to FEMA. FEMA chose to award an IA-TAC to FEI. FEI signed the IA-TAC on July 12, 2005, well before Hurricane Katrina even existed.

Under that IA-TAC, FEI was required to mobilize personnel and materials necessary to respond to a disaster anywhere in the United States upon 48 hours' notice from FEMA. The IA-TAC describes the types of services that FEI might be called upon to provide, but FEI was not authorized to undertake any work unless and until a properly authorized contracting officer of the federal government issued a task order to FEI calling for specific work. Under the IA-TAC, the government issued a variety of task orders to FEI, including Task Order 20, which covered staging, hauling and installing, maintenance and deactivation of mobile homes, park models and travel trailers, all of which are various types of emergency housing units that FEMA chose to provide to residents displaced by the storm. FEI played no role in, was not asked to, and did not evaluate the use of any of these structures as forms of temporary housing for displaced residents. Rather, that decision was made by FEMA, which had long experience since Hurricane Andrew struck Florida in 1992, using mobile homes and travel trailers as forms of emergency housing for displaced citizens.

FEMA's IA-TAC contained detailed specifications concerning how travel trailers would be installed on an individual's property. These detailed specifications had been generated

initially by the U.S. Army Corps of Engineers and had been utilized by FEMA prior to Hurricane Katrina.

FEI hired a number of licensed mobile home installers to act as installation subcontractors for it. Because there are no federal, state or local regulations concerning installation of travel trailers, licensed mobile home installers were a logical choice for this task. Mobile home installation is licensed in almost every state in the United States. Individuals with this background would have the most relevant experience for installing travel trailers.

FEI conducted 100% quality control inspections on travel trailers installed by its subcontractors. It would not pay a contractor for installation of a travel trailer until the unit had passed inspection. Additionally, FEMA had various types of technical monitors and QC individuals who were in the field on a regular basis checking on FEI's compliance with the travel trailer installation specifications. Ultimately, FEMA hired an independent QC contractor to conduct surprise quality control inspections on travel trailers.

Plaintiffs' trailer was installed according the FEMA's specifications by a FEI second tier subcontractor. The trailer was manufactured in 2004, had been hauled many thousand miles by others (neither FEI or its subcontractors) before it was delivered to Union Carbide/Dow in Southern Louisiana following Katrina.

Following that use, FEI had the trailer hauled from the FEMA staging yard to its own staging yard and inspected there. It was subsequently installed on plaintiffs' property ON February 16, 2006. FEI's subcontractor (MLU Services) and the subcontractor's subcontractor (Dan Lemieux's Mobile Home Service), both independent contractors as to FEI, acted reasonably and carefully in installing the trailer.

Subsequently, the trailer was moved off Plaintiff's property by another entity (not FEI or

its subcontractors) to facilitate demolition of plaintiffs' house located on that site, and reinstalled there, again by a third party, not FEI or its subcontractors. In early 2008, it was deactivated and hauled (by a third party, not FEI or its subcontractors) to Lottie, Louisiana where it was hauled off road and stored in the FEMA "graveyard" from early 2008 to May 2009, when it was first inspected by any Plaintiff expert. The trailer was maintained by an MDC contractor that was not FEI or any of its subcontractors from June 2006 until its deactivation in early 2008. FEMA did not maintain the trailer at all once it was located in the Lottie graveyard. Any claim by Plaintiff's experts that they know how and when the trailer was damaged or deteriorated is pure speculation.

FEI and its subcontractors did nothing to harm the plaintiffs' trailer or had no reason to believe that anything they did to the trailer by way of installing it according to Government-provided specifications would expose the occupants to formaldehyde. FEI believes its subcontractors were qualified to do the job assigned, and did it properly. FEI was prudent and careful in the selection of contractors and in offering necessary training, guidance and quality control oversight. If something was done improperly during installation however, which FEI does *not* believe to be the case, it was done by an independent contractor for whom FEI has no legal responsibility.

FEI did not choose, design, build or construct the trailer, and did nothing to harm plaintiffs in any way. By connecting the trailer to utilities and putting it on blocks per the Government's specifications, FEI did not thereby become a manufacturer of any new product. The trailer was and is a travel trailer. Nothing FEI or its subcontractors did changed it into something new or different.

Throughout FEI's response to hurricanes Katrina and Rita, the issue of formaldehyde or

strong odors in the trailers was never a major issue. Based on the “new smell” that some noticed when first entering a trailer that had been closed up, a practice had developed of airing out the trailers as part of the process of making the trailers ready for occupancy. FEMA, however, had always told FEI that the trailers were “mission ready,” and nothing was required of FEI other than to install the trailers precisely as required by the IA-TAC. That’s what FEI did.

By March 20, 2006, FEI received an email from the area housing office in New Orleans addressed to it and the other two contractors working in the state of Louisiana. This email was sent after a Biloxi news station had aired a story concerning formaldehyde in the travel trailers selected and provided by FEMA. The email inquired what the contractors were doing to air out the trailers,

FEI immediately acted on this email in a number of respects. First, it sent the email to its Health, Safety and Environmental Director on the project, Richard Belote. Additionally, because all communication with FEMA was to be directed to a single individual known as the Contracting Officer's Technical Representative (COTR), FEI's liaison with the COTR forwarded the email to the COTR, who indicated that no further response was required of FEI. This reply to the inquiry by FEI's liaison, Jim Rammell, was noted in a detailed log that was maintained throughout the project and shared with FEMA.

Notwithstanding this direction from FEMA, FEI's safety individuals conducted a testing that permitted them to come to the conclusion that the issue could be remedied by airing out the trailers. This conclusion was communicated by FEI to FEMA.

FEI at all times acted upon direct task and work orders issued to it by FEMA. At all times, its conduct was prudent and reasonable.

7. UNCONTESTED MATERIAL FACTS

- A. Plaintiff Alana Alexander and her minor son, Christopher Cooper are residents of the Parish of Orleans in the State of Louisiana.
- B. FEMA provided Plaintiff Alana Alexander and her minor son a travel trailer with Vehicle Identification Number (VIN) 1N61GTR2551021783.
- C. This travel trailer was manufactured by Defendant Gulf Stream Coach, Inc. on or about December 13, 2004.
- D. Gulf Stream Coach, Inc. sold the travel trailer to Best Buy RV on or about December 13, 2004.
- E. The travel trailer was delivered to Plaintiff and her minor son for occupancy in New Orleans, Louisiana at 4415 Dale Street.

8. **CONTESTED ISSUES OF FACT**

- A. The nature and extent of all pertinent warnings provided to the Plaintiff by Defendant Gulf Stream Coach, Inc.
- B. Whether or not there existed an unreasonably dangerous level or levels of off-gassed formaldehyde during the period of Plaintiff's occupancy of the Gulf Stream trailer.
- C. Whether or not the Gulf Stream trailer occupied by Plaintiff was unreasonably dangerous in its design for its intended or reasonably foreseeable use by Plaintiff.
- D. Whether or not the Gulf Stream trailer occupied by Plaintiff was unreasonably dangerous in its construction or composition for its intended or reasonably foreseeable use by Plaintiff.
- E. Whether or not the Gulf Stream trailer was unreasonably dangerous in its intended or reasonably foreseeable use, based on inadequate warnings to Plaintiff.
- F. Whether or not Defendant Fluor Enterprises, Inc. was a "manufacturer" of the trailer occupied by Plaintiff, according to the Louisiana Products Liability Act (LPLA).

- G. Whether or not Fluor Enterprises, Inc. altered or modified the trailer occupied by Plaintiff in such a way to render it unreasonably dangerous in construction or composition.
- H. Whether or not Fluor Enterprises, Inc. failed to provide an adequate warning regarding its alterations or modification of the trailer occupied by Plaintiff that rendered the unit unreasonably dangerous.
- I. The facts and circumstances surrounding the handling of the Gulf Stream unit by Fluor, its employees and/or agents.
- J. The amount of damages owed to Plaintiff as a result of the actions of Defendants, Gulf Stream Coach, Inc. and/or Fluor Enterprises, Inc., in regard to:
 - 1. Past, present, and future physical pain and suffering of Alana Alexander;
 - 2. Past, present, and future physical pain and suffering of Christopher Cooper;
 - 3. Past, present, and future mental anguish and emotional distress of Alana Alexander;
 - 4. Past, present, and future mental anguish and emotional distress of Christopher Cooper;
 - 5. Past, present, and future medical expenses for Alana Alexander;
 - 6. Past, present, and future medical expenses for Christopher Cooper;
 - 7. Loss or impairment of life's pleasures for Alana Alexander; and,
 - 8. Loss or impairment of life's pleasures for Christopher Cooper.
- K. The specifications in all contractual agreements between the United States/FEMA and both Gulf Stream Coach, Inc. and Fluor Enterprises, Inc.; and the respective parties' knowledge of, and communication with one another about, the risks to Plaintiff arising from any such specifications.
- L. The level of formaldehyde necessary to cause eye, nose and/or throat irritation.
- M. Whether formaldehyde can aggravate asthma; and if so, at what level.

- N. Whether Christopher Cooper's asthma was aggravated by exposure to formaldehyde from the Gulf Stream trailer.
- O. Whether Christopher Cooper's sinuses were damaged as a result of formaldehyde.
- P. Whether Christopher Cooper still has any current medical condition as a result of exposure to formaldehyde.
- Q. Whether Christopher Cooper has any permanent medical condition as a result of exposure to formaldehyde.
- R. Whether formaldehyde can cause permanent damage; and if so, at what level of exposure.
- S. Whether formaldehyde exposure can cause cancer; and if so, what type of cancer and at what level of exposure.
- T. Whether exposure to formaldehyde at the levels present in the Alexander trailer would cause a person to have a reasonable fear of contracting cancer.
- U. Whether Gulf Stream Coach, Inc. had a long-standing policy to purchase LFE composite wood products.
- V. What level of formaldehyde is necessary to cause eye, nose and/or throat irritation.
- W. Whether formaldehyde can aggravate asthma; and if so, at what level.
- X. Whether Christopher Cooper's pre-existing asthma was aggravated by exposure to formaldehyde from the Gulf Stream trailer.
- Y. Whether Christopher Cooper's sinuses were damaged as a result of formaldehyde.
- Z. Whether Christopher Cooper has any current medical condition caused by exposure to formaldehyde emitted by the Alexander/Cooper trailer while he lived there.
- AA. Whether Chris Cooper has any permanent medical condition caused by exposure to formaldehyde emitted by the Alexander/Cooper trailer while he lived there.
- BB. Whether formaldehyde can cause permanent damage to a person; and if so, what level of exposure is necessary to cause such damage.
- CC. Whether formaldehyde exposure can cause cancer; and if so, what type of cancer and at what level of exposure.

- DD. Whether the trailer used by Alexander/Cooper was damaged prior to, during, or after the initial installation on Dale Street in New Orleans in February 2006, such that the interior air formaldehyde levels were actually increased
- EE. Whether the contractor which lifted and blocked the Alexander/Cooper trailer was competent to do so.
- FF. Whether the February 2006 installation of the Alexander/Cooper trailer on Dale Street was in compliance with government specifications.

9. **CONTESTED ISSUES OF LAW:**

- A. Whether Defendant, Gulf Stream Coach, Inc. is liable to Plaintiff under the LPLA.
- B. Whether Fluor Enterprises, Inc. is liable to Plaintiff under the LPLA.
- C. Whether Fluor Enterprises, Inc. was negligent (in the alternative to B, supra).
- D. Whether the Defendants' legal fault, if any, was a cause-in-fact and proximate cause of damages sustained and recoverable by Plaintiff, individually and on behalf of her son Christopher Cooper.
- E. Whether Plaintiff Alana Alexander may be assessed with comparative fault.
- F. Whether there is a basis for asking the jury to allocate fault to a specific non-party person or entity, and, in the case of FEMA, whether that fault must rise to the level of gross or willful misconduct.
- G. Whether FEMA is strictly liable to Plaintiff as the landlord of the travel trailer.
- H. Whether the "government contractor defense" is available to Gulf Stream Coach, Inc. and/or Fluor Enterprises, Inc.
- I. Whether the Alexander unit was unreasonably dangerous, in design or construction that caused Alexander and/or Cooper to suffer damages.
- J. Whether the Alexander unit was unreasonably dangerous; whether Gulf Stream Coach, Inc. inadequately warned of that danger; and that inadequate warning caused damages to Alexander and/or Cooper.
- K. Whether Fluor Enterprises, Inc. was negligent (or manufactured an unreasonably dangerous product) and caused damages to Alexander and/or Cooper.

- L. Whether FEMA's actions or lack of action caused damage to Alexander and/or Cooper.
- M. Whether Best Buy RV was negligent, and did that negligence cause damages to Alexander and/or Cooper.
- N. Whether Fluor Enterprises, Inc.'s sub-contractor was negligent, and did said negligence cause damages to Alexander and/or Cooper.
- O. The amount of damages, if any, sustained by Chris Cooper
- P. The amount of damages, if any, sustained by Alana Alexander.
- Q. Whether the Alexander unit was defective in design or construction that caused Alexander and/or Cooper to suffer damages.
- R. Whether the Alexander unit was defective because of an inadequate warning, and said inadequate warning caused damages to Alexander and/or Cooper.
- S. Whether Fluor Enterprises, Inc. placed a product into commerce.
- T. Whether Fluor Enterprises, Inc. manufactured a product that caused damages to Alexander and/or Cooper.
- U. Whether specifications provided by the government are reasonably precise as a matter of law when they describe exactly the result desired but do not prevent the contractor from exercising some discretion as to methods of production.
- V. Whether Fluor Enterprises, Inc. is immune from the Alexander/Cooper claims as a government contractor
- W. Whether Fluor Enterprises, Inc. is protected from the demands of Alexander and Cooper by operation of La. R.S. 9:2771
- X. Whether the filing of a plaintiff class action tolls, interrupts, or suspends prescription on a claim by a putative member of the plaintiff class as against an entity not named as a defendant in the class complaint when there is no class of defendants named.
- Y. Whether Alana Alexander was negligent, and did said negligence cause damages to Christopher Cooper.
- Z. Whether the contractor which lifted and blocked the Alexander/Cooper trailer in February 2006, was negligent, and did said negligence cause damages to Alexander and/or Cooper.

- AA. Whether Fluor Enterprises, Inc. is responsible for any negligence of the Alexander/Cooper trailer lift/block contractor for its work in February 2006.
- BB. Whether the MDC contractor responsible for maintaining the Alexander/Cooper travel trailer from June 2006 until December 2007 was negligent in any way that proximately caused damage to plaintiffs.

10. **EXHIBITS**

See Parties' attached Exhibit List. Plaintiff is awaiting production of documents by Gulf Stream Coach, Inc. and also has two (2) pending motions to compel which may result in production of additional documents. Therefore, Plaintiff reserves the right to supplement the joint exhibit list.

11. **DEPOSITIONS**

PLAINTIFF

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

GULF STREAM

Gulf Stream Coach, Inc. may or will offer deposition testimony, or portions thereof, of witnesses identified in the attached list, as being presented by video.

FLUOR

FEI reserves the right to introduce by deposition the testimony of any witnesses who are unavailable to testify at trial, though subpoenaed to do so, or when an attempt to subpoena said witnesses is unsuccessful, or the person resides out of the jurisdiction of this Honorable Court.

12. **CHARTS AND GRAPHS**

The parties may use charts and graphs contained in their expert's reports or utilized during expert depositions. The parties have agreed to exchange charts and graphs, and other visual aides to be used at trial on September 9, 2009 at 5:00 p.m.

13. **WITNESSES**

See Parties' Joint Witness List Attached.

14. **JURY TRIAL**

The parties have submitted questions/instructions, and objections thereto, and have participated in an initial charge conference with the Court.

15. **DAMAGES**

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

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

None.

17. **TRIAL**

Trial shall commence on September 14, 2009 at 8:30 a.m. and will require at least ten days of trial to complete.

18. **STATEMENT OF COMPLIANCE-I**

This pre-trial order has been formulated after conference at which counsel for the respective parties have appeared in person. Reasonable opportunity has been afforded counsel for corrections, or additions, prior to signing. Hereafter, this order will control the course of the trial and may not be amended except by consent of the parties and the Court, or by order of the Court to prevent manifest injustice.

19. **STATEMENT OF COMPLIANCE-II**


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

20. **SETTLEMENT**

Possibility of settlement of this case was not considered as this case is a "bellwether" trial in this MDL proceeding.

21. **SIGNATURES**

New Orleans, Louisiana, this 8th day of September, 2009.



HON. KURT D. ENGELHARDT
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

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On Behalf of Fluor Enterprises, Inc.

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

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

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

THIS DOCUMENT IS RELATED TO

*Charlie Age, et al v. Gulf Stream Coach
Inc., et al*, Docket No. 09-2892;
Alana Alexander, individually and on behalf of
Christopher Cooper

* * * * *

JOINT EXHIBIT LIST

No.	Exhibit Description	Bates Range	Other ID	Offering Party	Objections
1	CDC Summary and Interim Report: VOC and Aldehyde Emissions in Four FEMA Temporary Housing Units – Indoor Environment Department, Lawrence Berkeley National Laboratory, 8 May, 2008	PSC002113 - PSC002166	P2		
2	U.S. Department of Health and Human Services and CDC Presentation Titled “Formaldehyde Levels in Occupied FEMA-supplied Temporary Housing Units (THUs) in LA and MS, Winter 2007-2008”	PSC002167 - PSC002181	P3		
3	CDC Interim Findings on Formaldehyde Levels in FEMA-Supplied Travel Trailers, Park Models, and Mobile Homes – February 29, 2008	PSC002182- PSC002202	P4		
4	CDC Final Report on Formaldehyde Levels in FEMA-Supplied Travel Trailers, Park Models, and Mobile Homes – July 2, 2008	PSC002203 - PSC002263	P5; GS67; GS88		
5	Agency for Toxic Substances and Disease Registry (ATSDR) “Health Consultation, Formaldehyde Sampling at FEMA Temporary Housing Units, Baton Rouge, Louisiana, February 1, 2007”	PSC002264 - PSC002277; ATSDR_FEMA0 0001-00014	P6; GS61; GS115		

6	ATSDR October 2007 "An Update and Revision of ATSDR's February 2007 Health Consultation: Formaldehyde Sampling of FEMA Temporary-Housing Trailers Baton Rouge, Louisiana, September-October 2007"	PSC002278 - PSC002318	P7; GS18; GS64; GS66		
7	"Formaldehyde Levels in FEMA-Supplied Trailers - Early Findings from the Centers for Disease Control and Prevention"	PSC003218 - PSC003219; FEMA08-000011 - FEMA08- 000012	P12; GS120		
8	ASTM Standard Test Method for Determining Formaldehyde Concentrations in Air and Emission Rates in Wood Products Using a Large Chamber (2002)	PSC021571 - PSC021582	P13		
9	Indoor Air Quality and Health in FEMA Temporary Housing for Trailer Residents prepared by CDC	PSC021583 - PSC021584	P14		
10	Trailer Manufacturers and Elevated Formaldehyde Levels Majority Staff Analysis, Committee on Oversight and Government Reform, U.S. House of Representatives dated on July 9, 2009	PSC024251 - PSC024277	P15		
11	Test Results of Unoccupied Units (Exhibit 1 to Burl Keel's deposition)	GS(COGR) 01811	P16		
12	November 17, 1986 Notice from Indiana Manufactured Housing Association, Inc. to James Shea	PSC021585	P18		
13	December 24, 1986 Notice from Indiana Manufactured Housing Association, Inc. to James Shea	PSC021586	P19		
14	March 24, 1987 Notice from Indiana Manufactured Housing Association, Inc. to James Shea	PSC021587	P20		
15	July 20, 2007 "Formaldehyde and FEMA Trailers" by Lee Shull, Ph.D	PSC021640 - PSC021641	P40		
16	August 10, 2007 FEMA Trailer Update to RVDA Members	PSC021642 - PSC021643	P41		
17	November 12, 2007 Email from Danny D. Ghorbani regarding Formaldehyde Standards to MHARR Manufacturers	PSC021644 - PSC021649	P42		
18	DRAFT Proposed White Paper for Indiana Legislature - Manufactured Housing: Formaldehyde Product Liability in Indiana	PSC021678 - PSC021692	P51		

19	Documents Received from Subpoena to Produce Documents Served on Recreational Vehicle Indiana Council Issued on 06/29/2009		P58		
20	ATSDR Formaldehyde Minimal Risk Levels and Worksheets – Appendix A	PSC003158 - PSC003172	P64		
21	Occupational Safety and Health Administration's (OSHA) Standards for Formaldehyde	PSC021754 – PSC021772	P67		
22	American Conference of Governmental Industrial Hygienists' (ACGIH) Standards for Formaldehyde		P68		
23	National Institute of Occupational Safety and Health's (NIOSH) Standards for Formaldehyde	PSC024278 – PSC024358	P69		
24	Housing and Urban Development's (HUD) Standards for Formaldehyde		P70		
25	World Health Organization (WHO) and Health Canada's Standards for Formaldehyde	PSC024359 – PSC024361	P71		
26	World Health Organization (WHO) and Health Europe's Standards for Formaldehyde	PSC024830 – PSC025117	P72		
27	American National Standard (ANSI) for Medium Density Fiberboard dated February 4, 1994	PSC021773 – PSC021784	P73		
28	American National Standard (ANSI) for Particleboard dated February 8, 1999	PSC021785 – PSC021797	P74		
29	FEMA's Standards for Formaldehyde established after August 2008	PSC024362 – PSC024829	P76		
30	Toxicological Profile on Formaldehyde prepared by ATSDR on July 1999		P77; GS46; GS63		
31	Code of Ethics for the Professional Practice of Industrial Hygiene	PSC025441- PSC025444	P78		
32	Testimony of Jim Shea before Congress dated July 9, 2008 (Exhibit 20 from the deposition of Dan Shea, 2009)	PSC025118 – PSC025132	P83		
33	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	P85		

34	"Effect of Formaldehyde Inhalation on Hsp70 in Seminiferous Tubules of rat testes: an immunohistochemical study" by O. Ozen, et al. (2005)	PSC021823 – PSC021829	P86		
35	"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	P87		
36	"Effects of inhaled Formaldehyde on Learning and Memory of Mice" by Z. Lu, et al. (2008)	PSC021847 – PSC021854	P88		
37	"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	P89		
38	National Cancer Institute (NCI): Fact Sheet: Formaldehyde and Cancer Risk dated May 7, 2009	PSC021867 – PSC021873	P90		
39	Ex-official: FEMA knew about trailer formaldehyde – News Article from Bay St. Louis Newspaper by Anthony James dated August 10, 2007	PSC021874 – PSC021875	P91		
40	FEMA media release: FEMA Awards Contracts for Low Emissions Travel Trailers – April 7, 2009 – Release No. HQ-09-034b	PSC021876 – PSC021879	P92		
41	Article - "Formaldehyde Exposure in Nonoccupational Environments" by K. Dally, et al.	PSC021881 – PSC021888	P94		
42	Article - "Formaldehyde-related Health Complaints of Residents Living in Mobile and Conventional Homes" by I. Ritchie, et al.	PSC021889 – PSC021894	P95		
43	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	P96		
44	Fact Sheet: Airborne Toxic Control Measure (ATCM) to Reduce Formaldehyde Emissions from Composite Wood Products		P97		
45	Environmental Health – Formaldehyde Exposure in Homes: A Reference for State Officials to Use in Decision-Making (March 2008)	PSC021897 – PSC021902	P98		

46	Environmental Health – What you should know about Formaldehyde in Mobile Homes	PSC021903 – PSC021906	P99		
47	“ <i>Formaldehyde Indoors</i> ” by Dr. Stephen Smulski, April 1987, Progressive Builder, 12(4):9-11.	PSC002752 - PSC002754	P103		
48	Asthma Project Report, February 28, 2001, Patricia M. Williams, Ph.D. and Results of Preliminary Asthma Education and Management Program	PSC002755 - PSC002844	P104		
49	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	P105		
50	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	P106		
51	Holmstrom, M. “ <i>Histological Changes in the Nasal Mucosa in Rats after Long-term Exposure to Formaldehyde and Wood Dust.</i> ” Acta Otolaryngol (Stockh) 108:274-283, 1989.	PSC002866 - PSC002881	P107		
52	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	P108		
53	Castro-Rodriguez, JA. “ <i>A Clinical Index to Define Risk of Asthma in Young Children with Recurrent Wheezing.</i> ” Am J Respir Crit Care Med 2000; 162(4 Pt 1):1403-06.	PSC002894 - PSC002897	P109		
54	Garrett, MH. “ <i>Increased risk of allergy in children due to formaldehyde exposure in homes.</i> ” Allergy 1999;54(4):330-7.	PSC002898 - PSC002905	P110		
55	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 - PSC002908	P111		
56	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	P112		
57	Rumchev, K. “ <i>Domestic exposure to formaldehyde significantly increases the risk of asthma in young children.</i> ” Eur Respir J 2002;20:403-8.	PSC002932 - PSC002937	P113		

58	NHLB/National Asthma Education and Prevention Program – “Section 3, The Four Components of Asthma Management;” “The Strong Association Between Sensitization To Allergens and Asthma: A Summary of the Evidence;” “Indoor/Outdoor Air Pollution Irritants;” “Assessment Questions For Environmental And Other Factors That Can Make Asthma Worse” and “ Section 4, Managing Asthma Long Term in Children 0-4 Years of Age and 5-11 Years of Age”	PSC002943 - PSC003012	P114		
59	Statement on National Vaccine Injury Compensation Program by Thomas E. Balbier, Jr., Director, National Vaccine Injury Compensation Program, U.S. Dept. of Health and Human Services, before the Committee on Government Reform, September 28, 1999	PSC003013 - PSC003016	P115		
60	Wantke, F, “ <i>Exposure to gaseous formaldehyde induces IgE-mediated sensitization to formaldehyde in school-children</i> ” <i>Clinical and Experimental Allergy</i> , 1996, Vol. 26, pages 276-280	PSC006055 – PSC006059	P118		
61	Krzyzanowski, Michal, “ <i>Chronic Respiratory Effects of Indoor Formaldehyde Exposure</i> ” <i>Environmental Research</i> 52, 117-125 (1990)	PSC006060 – PSC006068	P119		
62	“ <i>Do Indoor pollutants and thermal conditions in schools influence student performance? A critical review of the literature</i> ” by M.J. Mendell, et al.	PSC022202 – PSC022227	P121		
63	“ <i>Indoor Residential Chemical Emissions as Risk Factor for Children’s Respiratory Health</i> ” by M. Mendell	PSC022228 – PSC022267	P122		
64	Affidavit of Lee E. Branscome, Ph.D., C.C.M.	ALX-EXP-8- 000001 – ALX-EXP-8- 000021 ALX-EXP-8- 000022 – ALX-EXP-8- 000027	P124		
65	Curriculum Vitae of Lee Branscome, Ph.D., C.C.M.	ALX-EXP-5- 000001 – ALX-EXP-5- 000004	P125		

66	Weather data from Dr. Lee Branscome for Punta Gorda, Florida, New Orleans, Louisiana, and Lottie, Louisiana		P127		
67	Affidavit of Mary C. DeVany, M.S., C.S.P., C.H.M.M.	ALX-EXP-16-000001 - ALX-EXP-16-000034	P128		
68	Curriculum Vitae of Mary C. DeVany, M.S., C.S.P., C.H.M.M.	ALX-EXP-13-000001 - ALX-EXP-13-000008	P129		
69	THU Testing Protocol prepared by Mary DeVany et al.	PSC003220 - PSC003348	P131		
70	Affidavit of Paul Hewett, Ph.D.	ALX-EXP-20-000001 - ALX-EXP-20-000020	P132		
71	Curriculum Vitae of Paul Hewett, Ph.D.	ALX-EXP-17-000001 - ALX-EXP-EXP-17-000004	P133		
72	Affidavit of Marco Kaltofen, P.E.(Civil)	ALX-EXP-28-000001 - ALX-EXP-28-000017	P135		
73	Curriculum Vitae of Marco Kaltofen, P.E. (Civil)	ALX-EXP-25-000001 - ALX-EXP-25-000009	P136		
74	Affidavit of Gerald McGwin, Jr., M.S., Ph.D.	ALX-EXP-48-000001- ALX-EXP-48-000006	P138		
75	Curriculum Vitae of Gerald McGwin, Jr., M.S., Ph.D.	ALX-EXP-45-000001- ALX-EXP-45-000035	P139		
76	Affidavit of Janet D. Barnes, M.D.	ALX-EXP-4-000001 - ALX-EXP-4-000004	P141		
77	Curriculum Vitae of Janet D. Barnes, M.D.	ALX-EXP-1-000001 - ALX-EXP-1-000002	P142		

78	Affidavit of Reagan Johnson	ALX-EXP-24-000001 - ALX-EXP-24-000023	P147		
79	Curriculum Vitae of Reagan Johnson	ALX-EXP-21-000001 - ALX-EXP-21-000010	P148		
80	Affidavit of James Kornberg, M.D., Sc.D.	ALX-EXP-32-000001 - ALX-EXP-32-000048	P150		
81	Curriculum Vitae of James Kornberg, M.D., Sc.D.	ALX-EXP-29-000001 - ALX-EXP-29-000012	P151		
82	Affidavit of Stephen Smulski, Ph.D.	ALX-EXP-73-000001 - ALX-EXP-73-000011	P153		
83	Curriculum Vitae of Stephen Smulski, Ph.D.	ALX-EXP-70-000001 - ALX-EXP-70-000010	P154		
84	Affidavit of Paul LaGrange	ALX-EXP-36-000001 - ALX-EXP-36-000017	P156		
85	Curriculum Vitae of Paul LaGrange	ALX-EXP-33-000001 - ALX-EXP-33-000004	P157		
86	Affidavit of Alexis Mallet, Jr.	ALX-EXP-44-000001 - ALX-EXP-44-000102	P162		
87	Curriculum Vitae of Alexis Mallet, Jr.	ALX-EXP-41-000001 - ALX-EXP-41-000008	P163		
88	Trailer drawings by Alexis Mallet, Jr.	PSC025194- PSC025202	P165		

89	Affidavit of Charles David Moore, P.E., P.L.S.	ALX-EXP-52-000001 - ALX-EXP-52-000007	P166		
90	Curriculum Vitae of Charles David Moore, P.E., P.L.S.	ALX-EXP-49-000001 - ALX-EXP-49-000003	P167		
91	Affidavit of Thomas H. Mayor, Ph.D.	ALX-EXP-82-000001 - ALX-EXP-82-000008	P169		
92	Curriculum Vitae of Thomas H. Mayor, Ph.D.	ALX-EXP-79-000001 - ALX-EXP-79-000003	P170		
93	Affidavit of Ervin Ritter, P.E.	ALX-EXP-60-000001 - ALX-EXP-60-000038	P171		
94	Curriculum Vitae of Ervin Ritter, P.E.	ALX-EXP-57-000001 - ALX-EXP-57-000003	P172		
95	Affidavit of Edward H. Shwery, Ph.D. regarding Alana Alexander	ALX-EXP-78-000001 - ALX-EXP-78-000003	P174		
96	Affidavit of Edward H. Shwery, Ph.D. regarding Christopher Cooper	ALX-EXP-68-000001 - ALX-EXP-68-000007	P175		
97	Affidavit of Edward H. Shwery, Ph.D. regarding Ericka Alexander	ALX-EXP-69-000001 - ALX-EXP-69-000007	P176		
98	Curriculum Vitae of Edward H. Shwery, Ph.D.	ALX-EXP-65-000001 - ALX-EXP-65-000016	P177		
99	Affidavit of William D. Scott, P.E., C.H.M.M.	ALX-EXP-64-000001 - ALX-EXP-64-000050	P179		

100	Curriculum Vitae of William D. Scott, P.E., C.H.M.M.	ALX-EXP-61-000001 – ALX-EXP-61-000005	P180		
101	W.D. Scott Group, Inc. – Formaldehyde Passive Monitoring Data – FEMA Housing Units (Test Results)	ALEX-00001	P182; GS36		
102	Affidavit of Karin A. Pacheco, M.D., M.S.P.H.	ALX-EXP-56-000001 – ALX-EXP-56-000009	P183		
103	Curriculum Vitae of Karin A. Pacheco, M.D., M.S.P.H.	ALX-EXP-53-000001 – ALX-EXP-53-000013	P184		
104	Affidavit of Patricia M. Williams, Ph.D., D.A.B.T.	ALX-EXP-77-000001 – ALX-EXP-77-000042	P186		
105	Curriculum Vitae of Patricia M. Williams, Ph.D., D.A.B.T.	ALX-EXP-74-000001 – ALX-EXP-74-000031	P187		
106	Spreadsheets of Symptoms: 1) Total Report of All Symptoms; 2) Report of Symptoms of Individuals With Neither Mold Nor Mildew Reported in Their THU and No Fumigation of Their THU; 3) Report of Symptoms of Individuals Who Did Not Smoke Inside Their THU and 4) Report of Symptoms of Individuals who Did Not Report Mold or Mildew, Did Not Smoke Inside, Did Not Have Their THU Fumigated and Did Not Have Service or Maintenance Repairs Prepared by Dr. Patricia Williams	PSC003451 - PSC003663	P189		
107	Formaldehyde Testing Database prepared by the PSC (as of May 19, 2009)	PSC021467	P190		
108	PSC Formaldehyde Testing Database Summary Graphs		P191		

109	20 Photographs of Plaintiffs Taken by Plaintiff's Counsel Photographs taken by D. Scott Johnson, Bombet, Cashio & Associates, on May 6, 2009 and May 7, 2009 at FEMA Lottie Staging/Storage Area	From the following series: PSC022269 – PSC022370; PSC022371 – PSC022719; PSC022720 – PSC022793; PSC025445 – PSC025654	P192		
110	Photographs of Alexander unit taken by WD Scott Group	PSC025203	P196		
111	Digitally created pictures of travel trailer		P198		
112	Pictures taken at Alexander travel trailer inspection on 4/17/09, including duct tape photographs		P199		
113	Photographs taken by Reagan Johnson of Gulf Stream Cavalier trailer occupied by Alana Alexander, Ericka Alexander & Christopher Cooper	ALX-EXP-24-000001 – ALX-EXP-24-000023	P200		
114	Test results of testing performed by Defendant, Gulf Stream Coach, on the Alexander travel trailer, 4415 Dale Street, New Orleans, LA		P201		
115	Lottie Travel Trailer (Receiving) Inspection Checklist	FEMA154-000001 to FEMA154-000011	P203; GS112		
116	Owner's Manual – Del Air Co. & R.V. (2007 model) - <i>Travel Trailers and Fifth Wheels Owner's Manual Gulf Stream Coach, Inc.</i>	PSC022806 – PSC022841	P206		
117	Warnings on Stabilization Jacks from Gulf Stream Cavalier units		P207		
118	Gulf Stream Travel Trailer Photographs of sticker "Not Intended For Recreational Purposes"	PSC022846	P208		
119	Gulf Stream Coach's contracts with FEMA		P213		

120	Material Safety Data Sheets for all Materials used in Gulf Stream Coach, Inc.'s units		P215		
121	November 2005 Travel Trailer Roof Construction Specifications and any prior specifications		P216		
122	Gulf Stream Coach, Inc.'s Installation Drawing	GULF0003027 – GULF0003031	P217		
123	Gulf Stream Coach, Inc. - Letter from James Shea to Jonathan Gibb of FEMA regarding potential issues (Exhibit 24 from the deposition of James Shea, 2009)	GULF0003011 - GULF 0003013	P218		
124	Gulf Stream Coach, Inc.'s Ambient Air Testing dated March 2006 ("Screenings")		P219		
125	Complaints received by Gulf Stream Coach, Inc. about formaldehyde issues or health concerns		P220		
126	BlueLinx Corporation Material Safety Data Sheet for Urea-Formaldehyde Bonded Wood Products	PSC003068 - PSC003078	P231		
127	Georgia-Pacific Material Safety Data Sheet for Urea-Formaldehyde Bonded Wood Products	PSC003079 - PSC003091	P232		
128	Emails from Manufacturing Defendants' Expert, Michael Ziemann, on or about July 9, 2004, regarding effect of temperature on formaldehyde	PSC025655 – PSC025678	P234		
129	Payments made to Gulf Stream Coach, Inc. by FEMA/Government regarding hurricanes Katrina and Rita housing		P235		
130	Email from Brandon Black dated September 17, 2008 to multiple parties regarding FEMA Formaldehyde (Exhibit P-2 to the deposition of Robert Funkhouser taken on September 30, 2008)		P236		
131	Email to Gulf Stream Coach Inc. from Wade Breaux, a trailer resident, complaining of odor, burning eyes and daily headaches. "Please, Please Help Me!!!" (Exhibit 6 from the deposition of Dan Shea)	GULF0004669	P237		

132	March 21, 2006 Email from Scott Pullin to Dan Shea regarding trailer occupant's complaint (Exhibit 13 from the deposition of James Shea, 2009)	GS(COGR)02211	P238		
133	Email from Jim Shea to Tallman Johnson (staff contact for Congressman Bob Ney) regarding calls this morning that includes an attachment	GULF0002238	P240		
134	Gulf Stream FEMA Meeting Agenda (getting ready for production)	GULF0000359	P241		
135	Contract for 25,000 Gulf Stream Travel Trailer units with FEMA - signed by Bryan McCreary (Solicitation Issue Date 8-19-2005)	GULF0002203- GULF0002218	P242		
136	Contract for 25,000 Gulf Stream Travel Trailer units with FEMA – unsigned (Solicitation Issue Date 8-25-2005)	GULF0002151- GULF0002658	P243		
137	Contract for 25,000 Gulf Stream Travel Trailer units with FEMA - signed by Bryan McCreary (Solicitation Issue Date 8-29-2005)	GULF0002166- GULF0002181	P244		
138	11:30 Plant #57 Operations Meeting Itinerary	GULF0000970	P245		
139	Email from Phil Sarvari to Bryan McCreary & Jonathan Gibb (FEMA) regarding production capacity	GULF0002273 – GULF0002274 & GULF0002276	P246		
140	Email from Kirk Barron to Dan Shea getting permission to buy 3/8" MDF in lieu of other more expensive materials	GULF0003053- GULF0003054	P247		
141	Email from Kirk Barron to Dan Shea regarding the structural ratings for proposed Norbord MDF with LFE	GULF0003038- GULF0003040	P248		
142	Packing slip from Adorn for "REG" Lauan	GULF0004042; GULF0003145	P249		
143	Packing slip from Adorn for "REG" Lauan	GULF0004045	P250		
144	Packing slip from Adorn for "REG" Lauan (Exhibit 5 from the deposition of James Shea)	GULF0004036	P251		

145	OSHA tests 177 units for formaldehyde at multiple FEMA Staging Facilities in Mississippi cities (Kiln, Pass Christian, Purvis, Bay St. Louis, Gulfport, Waveland, Ocean Springs); results above ATSDR standards, EPA & OSHA minimum exposure (Exhibit from the deposition of Dan Shea, 2009)	PSC023582 – PSC023591	P252		
146	Packing slip from Adorn for “REG” Lauan	GULF0004043	P253		
147	Invoices, Packing Slips and Bill of Lading for Adorn REG lauan (Exhibit 1 from the deposition of Dan Shea and Exhibit 3 from the deposition of James Shea)	GULF0004035- GULF0004041, GULF0004044	P254		
148	Picking List for order of Wood Bridge, Inc. product (LFE column blank)	GULF0004251; GULF0006115; GULF0006119; GULF0006122	P255		
149	Picking Lists for orders of Wood Bridge, Inc. product (LFE column blank)	GULF0004247, GULF0004249	P256		
150	Picking List for order of Wood Bridge, Inc. product (LFE column blank) (Exhibit 6 from the deposition of James Shea)	GULF0004244	P257		
151	FEMA Rail Tracking Report	GULF000783- GULF000784	P258		
152	Notes of odor complaints by Travel Trailer residents Wade Breaux and Bridgette Roland	GULF0002503- GULF0002504	P259		
153	John Bruhn's call to Brigitte Roland (trailer resident) regarding complaints	GULF0002505	P260		
154	Pullin's direction on how to handle odor complaints (to John Bruhn, Dan Shea, John Smith & Phil Sarvari) (Exhibit 11 from the deposition of James Shea and Exhibit 10B from the deposition of Scott Pullin)	GULF0003057 or GULF0004464	P261		
155	FEMA Production Supplier Database; Handwritten Notes	GULF0000050- GULF0000061	P262		
156	Maple Street delivery ticket for HUD certified lauan (Exhibit 4 from the deposition of James Shea)	GULF0004049- GULF0004050	P263		

157	Email from Dan Shea to Stephen Miller (FEMA) (also sent to James Shea) (Exhibit 28 from the deposition of James Shea)	GULF0002831, GULF0004465	P264		
158	Emails between D. Young, James, E. Gentry, Martinet, Lowery & Porter regarding news story of formaldehyde (Exhibit 5 from the deposition of Dan Shea)	GULF0004467- GULF0004470	P265		
159	Email from Wayne Stroeh to Michael Miller regarding OSHA testing	FEMA-Waxman- 3621-3625	P266		
160	Email from Stephen Miller and Sidney Melton (FEMA) ask Dan Shea to test trailers and Dan says yes (Exhibit 8 from the deposition of Dan Shea and Exhibit 7 from the deposition of James Shea)	GULF0004472	P267		
161	Contract for additional funds to Gulf Stream Coach, Inc. for delivery charges - signed by Bryan McCreary of FEMA	GULF0002219- GULF0002220	P268		
162	Testing data on Occupied Trailers from Scott Pullin (Exhibit 1 from the deposition of Scott Pullin)	GS(COGR)01570 -01586	P269		
163	OSHA conducts formaldehyde testing of trailers at Purvis, MS	GULF0003193- GULF0003196	P270		
164	FEMA Production Supplier Database; Handwritten Notes (Exhibit 19 from the deposition of James Shea)	GULF0000038- GULF0000049	P271		
165	Internal Gulf Stream Coach, Inc. emails (Don Jackson, Myrna Noel et al) regarding excess inventory at Plant 77	GULF0000938	P272		
166	Gulf Stream issues a statement regarding customer complaints (Exhibit 22 from the deposition of Dan Shea and Exhibit 22 from the deposition of James Shea)	GS(COGR)01489	P273		
167	Gulf Stream's PR firm, Porter Novelli, sends a statement to CNN	GS(COGR)00282	P274		
168	Kirk Barron sends an email to Dan Shea regarding suppliers of floor decking, stiles and MDF	GULF0003062	P275		
169	Memorandum regarding John Bruhn's call to Wayne Benjamin (resident) regarding complaint (Exhibit 2 from the deposition of Burl Keel and Exhibit 2 from the deposition of Scott Pullin)	GULF0002498- GULF0002499, GULF0004664	P276		

170	August 16, 2007 Email from John Brun regarding Darlene Moore (Exhibit 15 from the deposition of Dan Shea)	GULF0004576- GULF0004577	P277		
171	Phil Sarvari's Letter to Deidre Lee (FEMA Dir of Ops) regarding Gulf Stream Product Safety – May 11, 2006 (Exhibit 29 from the deposition of James Shea)	GULF0002336, GULF0002338- GULF0002340;	P278; GS5		
172	Email from Richard Rigby and Sidney Melton to Phil Sarvari with 9 bar codes from trailers in 4 MS counties (Jackson, Harrison, Hancock & George)	GULF0002520- GULF0002521	P279		
173	Email from Sidney Melton to Phil Sarvari asking him to check 4 bar codes, regarding fan (Exhibit 25 from the deposition of Dan Shea)	GULF0002522, GULF0004477	P280		
174	Email from Dan Shea to Darryl Madden (FEMA) with a link to an EPA website	GULF0002282	P281		
175	Email from Richard Rigby and Sidney Melton to Phil Sarvari asking him to check 11 bar codes	GULF0002518- GULF0002519	P282		
176	Letter from Dan Shea to David Porter confirming that Gulf Stream Coach, Inc. will direct all resident calls to FEMA	GULF0004478	P283; GS117		
177	John Bruhn's call with trailer resident Gertrude Toomey (Exhibit 12 from the deposition of Scott Pullin)	GULF0002497	P284		
178	Sue Super's transcript of resident Claudia Williams complaint (Exhibit 5 from the deposition of Scott Pullin)	GULF0004658	P285		
179	Sue Super's transcript of resident Paula Williams complaint (Exhibit 14 from the deposition of Scott Pullin)	GULF0003061	P286		
180	Mike Ward, John Smith, Scott Pullin, Dan Shea and Phil Sarvari's emails about a complaint from Michelle Vought (Exhibit 13 from the deposition of Scott Pullin)	GULF0002532, GULF0002494	P287		
181	Daily FEMA Call Log regarding Resident Miles Resor left an Afterhours message asking for MSDS sheets (May 23, 2006) (Exhibit 15 from the deposition of Scott Pullin)	GULF0002351- GULF0002352	P288		
182	Dan Shea and Karen Jackson, Stephen Reams, Stephen Miller, Chairman Ross et al email chain regarding two people who called in with complaints	GULF0002536- GULF0002538	P289		

183	Jill Igert and Stephen Miller's emails regarding 5/18 article on testing and a man in Slidell	GULF0002844- GULF0002846	P290		
184	Resident Paula William's complaint of odor that comes from "stool" (Exhibit 31 from the deposition of Dan Shea)	GULF0002495	P291		
185	Resident Carol Blossom's complaint of odor in her trailer (Exhibit 32 from the deposition of Dan Shea and Exhibit 6 from the deposition of Scott Pullin)	GULF0002496	P292		
186	Memo from Bronson Brown (OSHA) to Jesse Crowley regarding testing done in March 2006	GULF0003193- GULF0003196	P293		
187	Call from Gulf Stream to Miles Resor regarding Resor's request for MSDS Sheets (Exhibit 16 from the deposition of Scott Pullin)	GULF0002349- GULF0002350	P294		
188	Letter from Dan Shea to David Porter regarding Resor's request for MSDS sheets (Exhibit 26 from the deposition of Dan Shea)	GULF0002506- GULF0002507	P295		
189	Emails between Dan Shea and David Porter, Margarita Dibenedetto, Dondra Landry, Rosalind Scott and Stephen Miller (FEMA) regarding Resor	GULF0002834- GULF0002835	P296		
190	Jordan Fried (Associate General Counsel for Litigation at FEMA) decides not to turn over the MSDS sheets to Miles Resor (Exhibit 14 from the deposition of Dan Shea)	GULF0004487- GULF0004494	P297		
191	Open letter from Ann Benjamin (Sampling USA) explaining the company's terminology in reference to its plywood glues (MR, LFE, T1)	GULF0003423	P298		
192	Letter from Miles Resor's lawyer, Donald Pierce, to Gulf Stream asking for information on what chemical fumes/substances Resor might have been exposed to in the trailer	GULF002542	P299		
193	Scott Pullin's response to Donald Pierce	GULF0002544- GULF0002555	P300		
194	Daily FEMA Call Log regarding John Bruhn's call with resident William Lecke regarding headaches (July 25, 2006) (Exhibit 11 from the deposition of Scott Pullin)	GULF0002501- GULF0002502	P301		

195	Letter from Timothy Scandurro to Rick Preston encouraging FEMA to do a broad cross-section of testing and giving recommendations on how to perform testing (Exhibit 24 from the deposition of Dan Shea)	GULF0002342- GULF0002345	P302		
196	Daily FEMA Call Log regarding John Bruhn's call with resident Jorge Lauraina (August 10, 2006)	GULF0002500	P304		
197	Scott Pullin and Dan Shea forward handwritten letters asking for help from resident Stephanie Hamman to Stephen Miller	GULF0002546- GULF0002587	P305		
198	Betsy Hall's summary of the "Bi-Monthly Formaldehyde Conference Call" ; forwarded by Stephen Miller to Dan Shea	GULF0002326- GULF0002327	P306		
199	April 27, 2007 Statement from Gulf Stream Coach, Inc. regarding products and consultation with a physician (Exhibit 21 from the deposition of Dan Shea and Exhibit 23 from the deposition of James Shea)	GULF0003204	P307		
200	Statement not on Gulf Stream letterhead that is a shortened version of 4/27/07 statement	GULF0003202	P308		
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202	Letter from James Shea to Deidre Lee addressing recent news coverage	GULF0003180- GULF0003182	P310		
203	Email from Randy LeBouef to Gulf Stream (with handwritten notes) about trailer he purchased (Exhibit 17 from the deposition of Scott Pullin)	GULF0003218	P311		
204	Emails between John Bruhn, John Smith, Mike Ward, Phil Sarvari and Dan Shea regarding trailer resident Art McGuire (Exhibit from the deposition of Scott Pullin)	GULF0004581- GULF0004582	P312		
205	Letter from James Shea to Deidre Lee recommending two devices to mitigate formaldehyde	GULF0003176	P313		
206	Emails between Stephen Miller and Dan Shea regarding what can be done to avoid scrapping all of the trailers	GULF0003178	P314; GS6		

207	Stephen Miller gives Dan Shea the name and number of the head of the CDC Mitigation Study Team	GULF0003179	P315		
208	Gulf Stream releases a statement that, as of 3/17/08, all new Gulf Stream Coach, Inc. RV vehicles will be solely made of wood products that meet CARB standards	GULF0003205	P316		
209	Travel trailer floor plans (Exhibit 27 from the deposition of Dan Shea)	GULF0000753 – GULF0000755, GULF0000757 – GULF0000758	P319; GS7; GS8; GS9		
210	Notes of a series of phone calls in one afternoon to confirm order and obtain a contract	GULF0002253	P321		
211	Letter from Patrick Industries to customers regarding LFE lauan	CROSSROADS0 000090	P323		
212	Breakdown of panels supplied to plants (design, size, number) (Exhibit 2 from the deposition James Shea)	GULF0003829	P324		
213	FEMA Production Supplier Database	GULF0004003 – GULF0004010	P325		
214	FEMA Production Supplier Database	GULF0003718 – GULF0003729	P326		
215	Complaint from purchaser of FEMA unit Dispatched: 11/16/05 (Exhibit 10 from the deposition of James Shea)	GULF0004520	P328		
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230	Fluor Engineering: Engineering Capabilities, Design Capabilities and Contingency Operations (Fluor website)	PSC023593 – PSC023597	P349		
231	Fluor Corporate News Release “Fluor Achieves Nine Million Safe Work Hours Supporting FEMA’s Hurricane Katrina Relief Effort (Exhibit P-5 to the deposition of Robert Funkhouser taken on September 30, 2008)	PSC023598	P351		
232	Formaldehyde Test results from Bonner Analytical Testing Company prepared for CH2M Hill, Inc., April 6, 2006	PSC003400 - PSC003406	P352		
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234	Fluor Enterprises, Inc. – Installation Manual Revision Log (6/8/09)	FL-FCA-006941 to FL-FCA-006947	P354		
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245	U.S. Department of Homeland Security – FEMA – Travel Trailer Inspections – Field Inspectors	FL-FCA-06913 to FL-FCA-06940	P365		
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247	FEMA Individual Assistance (IA) Hourly Rate Schedule	FL-FCA-07138 to FL-FCA-07139	P367		

248	Fluor Quality Assurance Quality Control Plan for FEMA contract	FL-FCA-07140 to FL-FCA-07158	P368		
249	Section J; Attachment B for Individual Subcontracting Plan for FEMA contract	FL-FCA-07158 to FL-FCA-07174	P369		
250	Work Order for Alana Alexander - Air - TMNO	FL-FCA-07175 to FL-FCA-07176	P370		
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252	Typical Travel Trailer Pier Construction (Diagram)	FL-FCA-07178	P372		
253	Email string dated October 14, 2005 originating from U.S. Army Corps of Engineers to FEMA - Forwarded on to Fluor group Re: Contract Clarification/Mod - Blocking details	FL-FCA-07179	P373		
254	Email string dated September 20, 2005 - Forwarded on to Fluor group Re: Travel Trailer Blocking Requirement	FL-FCA-07180 to FL-FCA-07185	P374		
255	Fluor - Technical Direction Log	FL-FCA-07186 to FL-FCA-07247	P375		
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259	Tool Box Training - Proper Jacking Techniques	FL-FCA-07306	P379		
260	"Important Information for Travel Trailer Occupants" FEMA brochure	PSC002350 - PSC002351; FEMA08-000013 - FEMA08-000014; GULF0003191-GULF0003192	P380; GS118; GS129; F102		
261	Letter from Bennie G. Thompson, Chairman of the U.S. House of Representatives Committee on Homeland Security, dated November 19, 2007, to R. David Paulison and Paulison's response, dated December 11, 2007	PSC002938 - PSC002942	P381		
262	FEMA Model Travel Trailer Procurement Specifications Dated: July 14, 2005	PSC003049 - PSC003057	P382		
263	"FEMA Storage Site Duties/Responsibilities"	PSC003092 - PSC003094	P384		

264	"FEMA Trailer User's Guide Version 5" - Copyrighted By CH2M Hill, Inc., 4/6/06	PSC003095 - PSC003096	P385		
265	Summary of Test Results conducted by Weston Solutions, Inc. for the U.S. EPA	PSC003407 - PSC003409	P387		
266	Air Toxics Ltd. Laboratory Narrative for samples submitted by Weston Solutions	PSC003410 - PSC003415	P388		
267	FEMA test results for formaldehyde testing at FEMA THU staging areas during November 2005, December 2005 and January 2006	PSC003416 - PSC003420	P389		
268	FEMA Memorandum from May 31, 2006 regarding Formaldehyde Air Sampling at the THU staging area in Purvis, Mississippi	PSC003421 - PSC003438	P390		
269	Email correspondence between FEMA and Government staff	PSC003439 - PSC003447	P391		
270	FEMA Job Hazard Analysis Worksheet	PSC023600	P392		
271	FEMA Model Travel Trailer Procurement Specifications dated August 12, 2004	FOREST-0002503 - FOREST-0002508	P393; GS17		
272	New FEMA Procurement Specifications dated April 11, 2008 Release Number HQ-08-056	PSC023601 - PSC023686	P394		
273	FEMA Procedure Storage Site Manual Fall 2005	FLE-00001942 to FLE-00001945	P397		
274	Daily FEMA Phone Log from John Bruhn dated 3/10/06 (Exhibit 10A from the deposition of Scott Pullin)	GULF0002505	P398		
275	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	P400		
276	U.S. General Services Administration - Usable Travel Trailers Sales Certification	PSC023706	P401		
277	FEMA media release: The Deployment and Sale of Temporary Housing Units - August 1, 2007	PSC023716 - PSC023717	P402		
278	FEMA media release: FEMA to Test Methods to Reduce Formaldehyde in Travel Trailers - August 08, 2006	PSC023718 - PSC023719	P403		
279	FEMA media release: FEMA Study: Ventilating Travel Trailers can Significantly Reduce Formaldehyde Emission Levels - May 04, 2007	PSC023720 - PSC023722	P404		

280	FEMA media release: FEMA Continues to Address Formaldehyde Concerns - July 18, 2007	PSC023726	P405		
281	FEMA media release: Formaldehyde and Travel Trailers - July 20, 2007	PSC023727– PSC023729	P406		
282	FEMA media release: Transfer of FEMA Unused Mobile Homes to Tribal Governments - September 11, 2007	PSC023730 – PSC023734	P407		
283	FEMA Myths & Facts : Travel Trailers - November 8, 2007	PSC023735– PSC023737	P408		
284	FEMA media release: FAQs Refund of Temporary Housing Units - January 17, 2008	PSC023741– PSC023743	P409		
285	FEMA media release: Unfounded: Assertions that FEMA Ignored or Manipulated Formaldehyde Research - January 29, 2008	PSC023745 – PSC023746	P410		
286	FEMA media release: Katrina/Rita Housing Facts - January 29, 2008	PSC023747– PSC023751	P411		
287	FEMA media release: FEMA's Ongoing Response to Formaldehyde - February 12, 2008	PSC023752 – PSC023754	P412		
288	FEMA media release: CDC Results of Formaldehyde Level Tests - February 14, 2008	PSC023760 – PSC023761	P413		
289	FEMA media release: FEMA Plan of Action on Formaldehyde Findings to be Implemented Immediately - February 14, 2008	PSC023762 – PSC023763	P414		
290	FEMA media release: FEMA Offering Formaldehyde Testing to Occupants of Trailers and Mobile Homes in Disasters Nationwide - February 22, 2008	PSC023764	P415		
291	FEMA media release: Formaldehyde Testing to be Conducted in all Unoccupied Manufactured Housing Units before Delivery to States, Occupants - March 7, 2008	PSC023765	P416		
292	FEMA media release: Latest Tests Show Low Levels of Formaldehyde in Mobile Homes - March 12, 2008	PSC023766	P417		
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294	FEMA Statement on Formaldehyde - July 9, 2008	PSC023771	P419		
295	FEMA media release: Myths & Facts about FEMA Housing Following Katrina - May 26, 2008	PSC023772 – PSC023774	P420		

296	FEMA media release: New Task Contract Awarded for Temporary Housing Units - August 4, 2008	PSC023779	P421		
297	FEMA media release: Frequently Asked Questions - October 27, 2008	PSC023780– PSC023782	P422		
298	FEMA media release: Additional Testing and Housing Options Available for FEMA-provided Manufactured Homes Occupants - October 27, 2008	PSC023783– PSC023784	P423		
299	FEMA media release: Initial Indoor Air Quality Tests Results - November 14, 2008	PSC023789– PSC023790	P424		
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303	June 15, 2006 Email from Stephen Miller to Scott Pullin regarding MSDS sheets (Exhibit 19 from the deposition of Dan Shea)	GULF0002354	P428		
304	October 10, 2005 Letter from Jim Shea, Dan Shea, and Brian Shea to R. David Paulison (Exhibit 1 from the deposition of Brian Shea and Exhibit 21 from the deposition of James Shea)	GULF0003008	P429		
305	March 17, 2006 Email from Dan Shea to Stephen Miller regarding Formaldehyde (Exhibit 4 from the deposition of Dan Shea)	GULF0004466	P430		
306	March 21, 2006 Email chain involving Dan Shea , Sidney Melton and Stephen Miller (Exhibit 7 from the deposition of Dan Shea)	GULF0004471	P431		
307	May 24, 2006 Email involving Chairman Ross, Stephen Miller and Dan Shea; re: Formaldehyde news story (Exhibit 11 from the deposition of Dan Shea)	GULF0004479	P432		
308	Daily FEMA Phone Log from John Bruhn dated 05/10/2006 (Exhibit 3 from the deposition of Scott Pullin)	GULF0004668	P433		
309	Daily FEMA Phone Log from John Bruhn dated 07/25/2006 (Exhibit 7 from the deposition of Scott Pullin)	GULF0004635	P434		
310	Daily FEMA Phone Log from John Bruhn dated 08/10/2006 (Exhibit 8 from the deposition of Scott Pullin)	GULF0004632	P435		

311	Email from Christopher DeRosa to Howard Frumkin on February 27, 2007	PSC023796	P436		
312	Correspondence from Christopher DeRosa to Patrick Preston on February 27, 2007	PSC023797	P437		
313	Email from Christopher DeRosa to Howard Frumkin and Thomas Sinks on March 9, 2007	PSC023798– PSC023799	P438		
314	Email from Christopher DeRosa to Mike Groutt on August 10, 2007	PSC023800	P439		
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316	Correspondence from Christopher DeRosa to Howard Frumkin on September 21, 2007	PSC023802– PSC023808	P441		
317	Email from Thomas Sinks to All CDC on October 12, 2007	PSC023809	P442		
318	NCEH/ATSDR Procedures regarding Official Interaction with Persons or Organization outside of NCEH/ATSDR	PSC023810 – PSC023811	P443		
319	Logbook of Joseph Little		P444		
320	Email from Patrick Preston to Scott Wright on November 30, 2005	PSC023812	P445		
321	Email from Scott Wright and Joseph Little to Richard Nikel, et al. on December 7, 2006	PSC023813	P446		
322	Correspondence between Barbara Rogers to Angela Davis and Sascha Fielding on March 21, 2007	PSC023814	P447		
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324	Correspondence from Mark Keim to Patrick Preston on March 17, 2007	PSC023816 – PSC023817	P450		
325	Correspondence from Patrick Preston to Scott Wright on November 30, 2005	PSC023818	P451		
326	Email between Sam Coleman, Joseph Little and Scott Wright on December 1, 2006	PSC023819– PSC023821	P452		
327	Correspondence from Mark Keim to Patrick Preston on February 1, 2007	PSC023822– PSC023823	P453		
328	Email to and from Philip Allred on February 15, 2007	PSC023824	P454		
329	Email from Anne Sowell to Mark Bashor on August 8, 2007		P455		
330	Email between Patrick Preston and Margaret Ramos on February 27, 2007	PSC023825	P456		
331	Email between David Chawaga and Mary Margaret Walker on May 1, 2007	PSC023826– PSC023827	P457		

332	FEMA: Interim Direction on use of Temporary Housing Units (Revision Effective Date: March 10, 2008)	PSC023828 – PSC023834	P458		
333	FEMA: FEMA Begins Next Phase of Inventory Reduction of Excess Temporary Housing Units	PSC023710 – PSC023715	P459		
334	Any and all documents produced by Dr. Christopher DeRosa at his deposition, which was taken on or about July 6, 2009, or used as exhibits thereto		P460		
335	Gulf Stream Owner's Manual from Alana Alexander's unit (2004 model)	PSC023835– PSC023869	P461; GS4		
336	Alexander/Cooper unit documents with their THU move in and out dates	PSC023870– PSC023873	P462		
337	Alexander Unit Inspection Report	PSC023874– PSC023877; FEMA09-000073	P463; GS2		
338	Blueprint, Diagrams, and/or sketches of the Alexander – Gulf Stream travel trailer		P465		
339	Document evidencing the temperature and humidity on Monday, January 28, 2008 through Tuesday, January 29, 2008, the dates the Alexander- Gulf Stream travel trailer was tested by WD Scott Group, Inc.		P466		
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341	FEMA Unit Inspection Report for the Alexander unit		P468		
342	Florida State Letter of Guaranty for the Alexander unit		P469		
343	Any other documents concerning the Travel Trailer provided to Alana Alexander		P470		
344	Plaintiff Fact Sheets for Alana Alexander		P471; F3		
345	Plaintiff Fact Sheets for Christopher Cooper		P472; F3		
346	Standard Form 95 for Alana Alexander	FEMA-000961 - 000964	P473; GS111		
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348	Disaster File on Alana Alexander	FEMA137-000001- FEMA137-000086	P475; GS110; GS154; F4; P399		
349	Correspondence from Alexander to FEMA		P476		
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353	Family photos of Alana Alexander and Christopher Cooper		P480		
354	Photographs of Alana Alexander's neighborhood and Gulf Stream unit		P481		
355	Photographs of Alana Alexander's home after hurricane Katrina	PSC023964	P482		
356	Fluor Enterprises, Inc. Installation Package for Alana Alexander – Residential RFO Package Completion Form	FL-FCA-004609 to FL-FCA-004635; FL-FCA-025271 to 025284 FL-FCA-007175 to 007176	P484; F5; P586		
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358	Report Cards and Kipp report on Christopher Cooper		P486		
359	Affidavit of Sabal Palm Elementary Records	PSC023967– PSC023968	P487		
360	Chris Cooper's 3 rd Grade Records		P488		
361	Christopher Cooper - Education Records from KIPP: McDonogh 15 School for Creative Arts		P489		
362	Christopher Cooper - Altar Server Award from Serra Club of the Metropolitan New Orleans	PSC023969	P490		
363	Alana Alexander - Employment Records from KIPP: McDonogh 15 School for Creative Arts	PSC023970– PSC023996	P491		
364	Medical Records on Christopher Cooper		P492; F51		
365	Medical Records on Alana Alexander		P493; F51		

366	Christopher Cooper - Medical Records from Children's Hospital, New Orleans, Louisiana	PSC025679– PSC025766	P494		
367	Christopher Cooper - Medical Records from National Jewish Health, Denver, Colorado	PSC023997– PSC024083	P495		
368	Christopher Cooper - Medical Records from Dr. Janet Barnes, New Orleans, Louisiana	PSC025904– PSC025937	P496		
369	Christopher Cooper - Medical Records from University Hospital, New Orleans, Louisiana	PSC025767– PSC025806	P497		
370	Christopher Cooper- Radiology Films from LSU Hospital	PSC025807– PSC025814	P498		
371	Christopher Cooper - Prescription Records from Walgreens Pharmacy	PSC025815– PSC025903	P499		
372	Prescription Records from Walgreen's Pharmacy for Alana Alexander	PSC024084– PSC024102	P500		
373	Medical Records from Kids and Families in Jacksonville, FL	PSC024103– PSC024112	P501		
374	Dental Records from Dr. Honore for Alana Alexander	PSC024113– PSC024119	P502		
375	Christopher Cooper - Nurse's Records from KIPP: McDonogh 15 School for Creative Arts	PSC024120– PSC024125	P503		
376	Medical records from East Jefferson Hospital on Alana Alexander		P504		
377	Medical records from Quest Diagnostic on Christopher Cooper	PSC024126– PSC024130	P505		
378	Medical records from East Jefferson Hospital on Christopher Cooper		P506		
379	Hurricane Katrina Temporary Housing Chart from Williams, Adley & Company, LLP	PSC024131	P511		
380	Material Safety Data Sheet for Wood and Wood Products from Georgia-Pacific	PSC024132– PSC024136	P512		
381	PRI, Critical Government Services Worldwide's website	PSC024137– PSC024186	P513		
382	Del-Jen, Inc., a Fluor Company's website	PSC024187– PSC024231	P514		
383	Payments by FEMA/Government to Gulf Stream Coach, Inc., Fluor Enterprises, Inc., Del-Jen, Inc. and any other Fluor entity		P515		
384	Warning Label regarding Formaldehyde	PSC024232	P516		
385	Formaldemeter 400 Advertisement (Exhibit 15 from the deposition of James Shea, 2009)	PSC024233– PSC024234	P517		
386	Installation Temporary of Mobile Structures (Exhibit 3 from the deposition of Dan Shea, 2009)	FL-FCA-000066, FL-FCA-001438 to FL-FCA-001439	P518		

387	Gulf Stream, PDI Checklist (Exhibit 18 from the deposition of Dan Shea and Exhibit 26 from the deposition of James Shea, 2009)	FGC012 – FGC000040	P519; GS3		
388	Purchase Order between Adorn LLC (Dan West) and Friendship Homes of Minnesota (Wayne Sundstedt) for PB and Lauan (Exhibit 13 from the deposition of Dan Shea)	GULF0000581	P524		
389	Any and all other documents/exhibits which may be identified or discovered on the basis of Defendants' responses to discovery which has been timely propounded by Plaintiffs		P529		
390	Any and all other documents and exhibits which may be produced pursuant to any subpoena issued in this matter or utilized by any party at any deposition taken in this matter		P530		
391	"Inhalation of formaldehyde and xylene induces apoptotic cell death in the lung tissue" by <i>M. Sandikci, K. Seyrek, H. Aksit and H. Kose</i>		P531		
392	Addendum to Dr. Paul Hewett's Report	ALX-EXP-20-00 0252 - ALX-EXP-20-00 0271	P532		
393	Addendum to Dr. Lee Branscome's Report	ALX-EXP-8- 000022 - ALXEXP- 8-000023	P533		
394	Addendum to Weather data from Dr. Lee Branscome for Atlana, GA, Baton Rouge, LA, Lottie, LA, and MSY	ALX-EXP-8- 000024 ALX-EXP-8- 000027	P534		
395	Email original date of August 29, 2006 originating from Monica Jarves to Stephen Miller regarding blocking and strapping	FL-FCA 007772 – FL-FCA 00783	P535; F60		
396	Email original date of January 27, 2006 originating from Dick Fedderman to Kellie Turnis regarding maintenance of trailers	FL-FCA 008394- FL-FCA 008402	P536		
397	Email original date of November 22, 2005 originating from Juanita Gradney to Kevin McCarthy regarding Gulf Streams problem trailers	FL-FCA 009154- FL-FCA 009156	P537		

398	Email original date of June 20, 2006 originating from David Dudley to Melissa Wilson regarding Maintenance	FL-FCA 010442- FL-FCA 010445	P538		
399	Preventive Maintenance Inspection Form	FL-FCA 010840- FL-FCA 010841	P539		
400	Email original date of March 20, 2006 from Brian Boyle to No-Bid Contractors regarding Formaldehyde	FL-FCA 011222- FL-FCA 011223	P540; F26		
401	Powerpoint Presentation for Training n the proper way to haul and install (Exhibit 6 to Fluor 30(b)(6) deposition taken on August 5, 2009)	FL-FDA- 025557-FL-FDA- 025589	P541		
402	Haul and Install Training Manual (Exhibit 8 to Fluor 30(b)(6) deposition taken on August 5, 2009)	FL-FDA- 025530-FL-FDA- 025556	P542		
403	Fluor's Committing to Health & Safety (Exhibit 11 to Fluor 30(b)(6) deposition taken on August 5, 2009)	FL-FDA- 025479-FL-FDA- 025527	P543		
404	Respiratory Protection Document (Exhibit 14 to Fluor 30(b)(6) deposition taken on August 5, 2009)	FL-FDA- 025801-FL-FDA- 025829	P545		
405	Suno Formaldehyde Issues (Exhibit 16 to Fluor 30(b)(6) deposition taken on August 5, 2009)	FL-FDA-025853	P546		
406	Irritant Effects of Formaldehyde Exposure in Mobile Homes (Exhibit 17 to Fluor 30(b)(6) deposition taken on August 5, 2009)	FL-FDA- 025906-FL-FDA- 025907	P547		
407	Industrial Hygiene Direct Reading Instrument Survey (Exhibit 18 to Fluor 30(b)(6) deposition taken on August 5, 2009)	FL-FDA- 025908-FL-FDA- 025909	P548		
408	Industrial Hygiene Direct Reading Instrument Survey for Sherwood Forest Staging Area (Exhibit 19 to Fluor 30(b)(6) deposition taken on August 5, 2009)	FL-FCA-025283- FL-FCA-025284	P549		
409	E-mail history of Formaldehyde (Exhibit 20 to Fluor 30(b)(6) deposition taken on August 5, 2009)	FL-FDA- 025831-FL-FDA- 025834	P550		
410	Employee Formaldehyde Exposure (Exhibit 21 to Fluor 30(b)(6) deposition taken on August 5, 2009)	FL-FDA-025835	P551		
411	Primary work Memo of Patrick Logue	FL-FDA-025913	P552		
412	Memo to file by Patrick Logue dated May 25, 2006 (Exhibit 24 to Fluor 30(b)(6) deposition taken on August, 2009)	FL-FDA-025911- FL-FDA-025912	P553		

413	Haul and Install Contractor Selection	FL-FCA-019246- FL-FCA-019247	P554		
414	Fluor Contractor/ Subcontractor Site Safety Guidelines	FL-FCA-018626- FL-FCA-018652	P555		
415	Project Health Safety Environmental Program	FL-FCA-019518- FL-FCA-019524	P556		
416	Travel Trailer Training Syllabus	FL-FCA-019987- FL-FCA-019992	P557		
417	Site Assessment, Trailer Installation and Quality Control Training	FL-FCA-019969- FL-FCA-019986	P558		
418	Performance Work Statement Maintenance and Deactivation of Manufactured Homes and Travel Trailers	FL-FCA-022672- FL-FCA-022702	P559		
419	Fluor Quality Assurance Quality Control Plan	FL-FCA-020821- FL-FCA-020839	P560		
420	Email original dated October 28, 2005 originating from David Porter to Cindy Croxdale, Clifford Oliver and Marcus Tikotsky regarding Hand off of Installed Units for Continuing Operation and Maintenance	FL-FCA-016685- FL-FCA-016686	P561		
421	Email original dated June 20, 2006 from David Dudley to Melissa Wilson regarding Maintenance	FL-FCA-013955- FL-FCA-013958	P562		
422	Email original date of June 20, 2006 to Melissa Wilson regarding maintenance	FL-FCA-013950- FL-FCA-013954	P563		
423	Email original date of October 28, 2005 originating from Mark Ashby to Marcus Tikotsky regarding Task Order #16 – ARC Support –Request for POP extension	FL-FCA-025001- FL-FCA-025004	P564		
424	Private Site Work Process & Responsibilities	FL-FCA-018280- FL-FCA-018301	P565		
425	Draft A – November 14, 2005– Travel Trailer Set Up Inspection Report Guidance	FL-FCA-019666- FL-FCA-019668	P566		
426	Event Notification Log – May 22, 2006	FL-FCA-024902	P567		
427	Fluor Government Group –Material Request Form (MRF)	FL-FCA-024898- FL-FCA-024899	P568		
428	Fluor Hurricane Katrina/Rita Temporary Housing Response Effort – IA-TAC Program Updated February 16, 2006	FL-FCA-017982- FL-FCA-018003	P569		
429	Fluor Hurricane Katrina/Rita Temporary Housing Response Effort – IA-TAC Program Updated January 9,2006	FL-FCA-017933- FL-FCA-017981	P570		
430	Limitations to Capacity QA Inspection Reports from FEMA	FL-FCA-017931	P571		

431	Issues FEMA can Address	FL-FCA-017932	P572		
432	Formaldehyde Chemical Backgrounder	FL-FCA-019338- FL-FCA-019342	P573		
433	Email original date of April 4, 2006 from Adrell Pinkney to Barbara Russell regarding Warning on trailers: Health Concerns	FL-FCA-019330- FL-FCA-019333	P574		
434	Email dated April 6, 2006 from Patrick Logue to Barbara Russell regarding Warning on trailers: Health concerns	FL-FCA-019329	P575		
435	Draft Copy - Memo to file – Subject Temporary Housing Residual Formaldehyde Levels; Dated 5/25/06; From Patrick Logue	FL-FCA-019325	P576		
436	Hald, M., Agner, T., Blands, J., Ravn, H., and Johansen, JD. "Allergens associated with severe symptoms of hand eczema and a poor prognosis", <i>Contact Dermatitis</i> 2009; 61(2):101-108	PSC026046- PSC026053	P577		
437	Speit, G., Neuss, S., Schmid, O. "The human lung cell line A549 does not develop adaptive protection against the DNA-damaging action of formaldehyde", <i>Environ Mol Mutagen</i> 2009 Aug 20	PSC026054- PSC026061	P578		
438	Interview with Defense Expert Philip Cole, dated June 09, 2009 (upload date)		P579		
439	Fluor Project Execution Plan	FL-FCA 027797 - FL-FCA 027918	P580		
440	FEMA Individual Assistance Hourly Rate Schedule (Exhibit 5 to Dave Methot's Deposition taken on August 25, 2008 - Redacted version)	FL-FCA 000090 - FL-FCA 000091	P581		
441	Fluor Installation Record (Exhibit 10 to Dave Methot's Deposition taken on August 25, 2009)	FL-FCA 028700 - FL-FCA 028704	P582		
442	Email string regarding formaldehyde mitigation (Exhibit 11 to Dave Methot's Deposition taken on August 25, 2009)	FL-FCA 027761 - FL-FCA 027778	P583		
443	Email from Bukowski regarding FEMA comment on formaldehyde (Exhibit 12 to Dave Methot's Deposition taken on August 25, 2009)	FL-FCA 026655	P584		

444	Fluor Subcontractor Materials related to MLU (Exhibits 2-9 to Deposition of Richard Sober taken on August 25, 2009)	FL-FCA 028775 - FL-FCA 028829	P585		
445	Fluor's Work Plan (Exhibit 13 to Richard Sober's Deposition taken on August 25, 2009)	FL-FCA 017846 - FL-FCA 017850	P587		
446	Blanket Order Agreement between Fluor Enterprises, Inc. and MLU Services, Inc.	FL-FCA 002869 - FL-FCA 002986	P588		
447	Franklin, P. et al., Raised Exhaled Nitric Oxide in Healthy Children is Associated with Domestic Formaldehyde Levels. <i>Am. Rev. Resp. Crit. Care Med.</i> 2000; 161:1757-1759.		P		
448	Smedje, G. et al. Asthma Among Secondary School Children in Relation to the School Environment <i>Clin. & Exper. Allergy</i> 1997; 27:1270-1278.		P		
449	Smedje, G. et al. Incidence of Asthma Diagnosis and Self Reported Allergy in Relation to the School Environment – A Four-Year Follow-Up Study in Schoolchildren <i>Int. J. Tuberc. Lung Dis.</i> 2001; 5:1059-1066.		P		
450	Mi, YH et al. Current Asthma and Respiratory Symptoms Among Pupils in Shanghai, China: Influence of Building Ventilation, Nitrogen Dioxide, Ozone, and Formaldehyde in Classrooms. <i>Indoor Air</i> 2006; 16:454-464.		P		
451	Doi, et al. The Prevalence of IgE Sensitization to Formaldehyde in Asthmatic Children. <i>Allergy</i> 2003; 58:668-71.		P		
452	Pati, et al. Indoor Environmental Risk Factors for Asthma and Respiratory Ill Health in Preschool Children of Coastal Orissa, India. <i>Epidemiology</i> 2005; 16:132-133.		P		
453	Tavernier, G. et al. IPEADAM Study: Indoor Endotoxin Exposure, Family Status, and Some Housing Characteristics in English Children. <i>J. Allergy Clin. Immunol.</i> 2006; 117:656-662.		P		

454	Zho, Z. et al. Asthmatic Conditions Among Pupils in Relation to Winter Indoor and Outdoor Air Pollution in Schools in Taiyuan, China. <i>Env. Health Perspect.</i> 2008;116:90-97.		P		
455	ATSDR Minimal Risk Level (MRL) Worksheet (Exhibit 6 to Patricia Williams Deposition)	ATSDR0000447- ATSDR0000449			
456	Gulf Stream Coach Invoice #57-21783 dated 12/13/04 billed to Best Buy R.V. FEMA DFO Florida for Cavalier trailer (VIN# 1NL1GTR2551021783) with commitment letter, certificate of origin, sales order logs, driver acceptance form, tower-lender approval checklist, testing record sign-off sheet, L.P. Connection Tag receiver, torque specifications and serial number log, and towable 3 rd inspection checklist (Exhibit #18 to James Shea Deposition)		GS1		
457	Document depicting trailer frame with typewritten notations about steel tabs on main rails to "capture the floor."	GULF 0000765	GS10		
458	WSEC Builder's Field Guide, 7 th Edition, 2006n, Supplement B.		GS11		
459	"The Use of Blower Door Data", Max Sherman, Lawrence Berkeley National Laboratory, March 13, 2008.		GS12		
460	"Blower Door and Duct Blaster Testing", Southface Energy Institute for the Georgia Environmental Facilities Authority, dated January 16, 1997.		GS13		
461	ASHRAE Standard 62.2 "Ventilation for Acceptable Indoor Air Quality in Low-Rise Residential Buildings", 2007.		GS14		
462	ASHRAE Standard 62.1 "Ventilation for Acceptable Indoor Air Quality", 2007.		GS15		
463	NFPA 1192 "Standard for Recreational Vehicles", 2002 Edition		GS16		
464	Coggon, D., Harris, E. C., Poole, J., Palmer, K.T., 2003. Extended follow-up of a cohort of British chemical workers exposed to formaldehyde. <i>J. Natl. Cancer Inst.</i> 95, 1608-1615.		GS20		

465	Hauptmann, M., Lubin, J.H., Stewart, P.A., Hayes, R.B., Blair, A., 2003. Mortality from lymphohematopoietic malignancies among workers employed in formaldehyde industries. <i>J. Natl. Cancer Inst.</i> 95, 1615-1623.		GS21		
466	Marsh, C.M., Stone, R.A., Esmen, N.A., et al. 1994. Mortality patterns among chemical plant workers exposed to formaldehyde and other substances. <i>J. Natl. Cancer Institute</i> 86, 384-385.		GS22		
467	Marsh, G.M., Stone, R.A., Esmen, N.A., et al., 1996. Mortality patterns among chemical workers in a factory where formaldehyde was used. <i>Occup. and Environ. Med.</i> 53, 613-617.		GS23		
468	Marsh, G.M., Youk, A.O., Buchanich, J.M., Cassidy, L.D., Lucas, L.J., Esmen, N.A., and Gathuru, I.M., 2002. Pharyngeal cancer mortality among chemical plant workers exposed to formaldehyde. <i>Toxicol. Ind. Health</i> 18, 257-268.		GS24		
469	Marsh, G.M., Youk, A.O. 2004. Reevaluation of mortality risks from leukemia in the formaldehyde cohort study of the National Cancer Institute. <i>Regulatory Toxicology and Pharmacology</i> 40, 113-124.		GS25		
470	Marsh, G.M., Youk, A.O. 2005. Reevaluation of mortality risks from nasopharyngeal cancer in the formaldehyde cohort study of the National Cancer Institute. <i>Regul. Toxicol. Pharmacol.</i> 42, 275-283.		GS26		
471	Marsh, G.M., Youk, A.O. Morfeld, P., 2007a. Mis-specified and non-robust mortality risk models for nasopharyngeal cancer in the National Cancer Institute Formaldehyde Worker Cohort Study. <i>Regulatory Toxicology and Pharmacology</i> 47, 59-67.		GS27; GS57		
472	Marsh GM, Youk AO, Buchanich JM, Erdal S, Esmen NA., 2007b. Work in the Metal Industry and Nasopharyngeal Cancer Mortality among Formaldehyde-Exposed Workers. <i>Regulatory Toxicology and Pharmacology</i> 48:308-319.		GS28		

473	Stewart PA, Cubit DA, Blair A, 1987, Formaldehyde exposure levels in seven industries. <i>Applied Industrial Hygiene</i> 2:231-236.		GS29		
474	"Medical Management Guidelines for Formaldehyde." A publication of The Department of Health and Human Services, Agency for Toxic Substances and Diseases Registry. Updated 02/07/2008.		GS30		
475	"Formaldehyde Exposure in Homes: A Reference for State Officials to Use in Decision-making." A paper on Environmental Health, published by DHHS, the CDC, the U.S. Dept. of Homeland Security, FEMA, and the U.S. EPA. March, 2008		GS31		
476	Malo et al. Reactive airway dysfunction syndrome and irritant-induced asthma. <u>Up To Date</u> (Online v. 17.1); 1/2009		GS32		
477	Irvin, C.G. Bronchoprovocation testing. <u>Up To Date</u> (Online v. 17.1); 1/2009.		GS33		
478	Crapo, R.O., Casaburi, R., Coates, A.L., et al. Guidelines for methacholine and exercise challenge testing-1999. This official statement of the American Thoracic Society was adopted by the ATS Board of Directors, July 1999. <i>Am J Respir Crit Care Med</i> 2000; 161: 309		GS34		
479	G.G. Allan, Letter to Dr. E. Bardana, Health Science Center, University of Oregon, May 20, 1980.		GS37		
480	H. d'A. Heck, M. Casanova-Schmitz, P.B. Dodd, E.N. Schachter, T. J. Witek & T. Tosun, <i>Am. Ind. Hyg. Assoc. J.</i> , 1985, 46(1), 1.		GS38		
481	B. Zheng, W. Chen, & X. Xu, noted.		GS40		
482	X. Weng, C.H. Chon, H. Jiang & D. Li, <i>Food Chemistry</i> , 2009, 114(3), 1079.		GS43		
483	A.A.R. Kazakevics & D.J. Spedding, <i>Holzforschung</i> , 1979, 33, 156.		GS45		
484	Moser, B.F. Bodrogi, G. Eibl, M. Lechner, J. Rieder, and P. Lirk: Mass Spectrometric Profile of Exhaled Breath – Field Study by PTR-MS. <i>Respir Physiol Neurobio</i> 145: 295-300 (2005).		GS48		

485	Kaminski, J., A. S. Stwal, and S.s Mabadevan: Determination of formaldehyde in Fresh and Retail Milk by Liquid Column Chromatography, <i>JAOAC Inter</i> 76 (5): 1010-1013 (1993) and Weng, X., C.H. Chon, H. Jiang, and D. Li: Rapid Detection of Formaldehyde Concentration in Food on a Polydimethylsiloxane Microfluidic Chip. <i>Food Chem</i> 114: 1079-1082 (2009).		GS49		
486	Lang, I., T. Bruckner and G. Triebig: Formaldehyde and Chemosensory Irritation in Humans: A Controlled Human Exposure Study. <i>Regul Toxicol Pharmacol</i> 50: 23-36 (2008).		GS50		
487	Paustenbach, D., Y. Alarie, T. Kully, N. Schachter, R. Smith, et al.: A Recommended Occupational Exposure Limit for Formaldehyde Based on Irritation. <i>J Toxicol Environ Health</i> 50: 217-262 (1997).		GS51		
488	Arts, J.H., M. A. Rennen, and C. de Herr: Inhaled Formaldehyde: Evaluation of Sensory Irritation in Relation to Carcinogenicity. <i>Regul Toxicol Pharmacol</i> 44(2): 144-160 (2006).		GS52		
489	Arts, J.H., Muijser, C. F. Kuper, and R. A. Wouterson: Setting an Indoor Air Exposure Limit for Formaldehyde: Factors of Concern, <i>Regul Toxicol Pharmacol</i> 52(2): 189-194 (2008).		GS53		
490	Frigas, E., W. V. Filley, and C. E. Reed: Bronchial Challenge with Formaldehyde Gas: Lack of Bronchoconstriction in 13 Patients Suspected of Having Formaldehyde-Induced Asthma, <i>Mayo Clin Proc</i> 59: 295-299 (1984).		GS54		
491	Franklin, P.J.: Indoor Air Quality and Respiratory Health of Children. <i>Paed Respir Rev</i> : 281-286 (2007).		GS55		

492	Harving, H., J. Korsgaard, O.F. Pedersen, and L. Molhave: Pulmonary Function and Bronchial Reactivity in Asthmatics during Low-Level Formaldehyde Exposure. <i>Lung</i> 168: 15-24 (1990) and Harving, H., J. Korsgaard, R. Dahl, O.F. Pedersen, and L. Molhave: Low Concentrations of Formaldehyde in Bronchial Asthma: A Study of Exposure under Controlled Conditions. <i>Brit Med J (Clin Res Ed)</i> 293: 310 (1986).		GS56		
493	<i>Federal Register</i> 49 (155): 31986-32013 (August 8, 1984)		GS58		
494	ASHRAE: ASHRAE Standard 62.2-2004 – Ventilation and Acceptable Indoor Air Quality in Low-Rise Residential Buildings. American Society of heating, Refrigeration, and Air Conditioning Engineers, Inc., Atlanta, GA (2004).		GS59		
495	FEMA: Formaldehyde in FEMA Family Units Sampling Program, Baton Rouge, LA, Field Documentation, Data Files, and Analytical DATA DVD, November 13, 2006 (Cited by ATSDR above).		GS62		
496	Lemus, R., A.A. Abdelghani, T. G. Akers, and W. E. Horner: Potential Health Risks from Exposure to Indoor Formaldehyde. <i>Rev Environ Health</i> 13: 91-98 (1998).		GS65		
497	Saxon, K.G. and Shapiro, J. Paradoxical vocal cord motion. <u>Up to Date</u> (Online v. 17.1); 1/2009.		GS68		
498	National Jewish Health and Karin Pacheco, M.D., MSPH medical records related to Christopher Cooper, including, all clinical summaries, office encounters, laboratory tests, x-rays pulmonary function tests, radiology exams, etc.		GS69		
499	Jefferson Pulmonary Associates (EJGH) and Kenneth Smith, M.D. medical records relating to Christopher Cooper, including, all clinical summaries, office encounters, laboratory tests, x-rays, pulmonary function tests, radiology exams, etc.		GS70		

500	KIPP McDonough 15 School for the Creative Arts Records related to Christopher Cooper, including, all progress reports, report cards, disciplinary records, absentee records, doctors notes, nurses notes, school records, teacher assessments, faculty notes, PTA records, etc.		GS71		
501	MCLNO – University Hospital medical records related to Christopher Cooper, including, all clinical summaries, office encounters, laboratory tests, emergency room records, outpatient records, inpatient records, radiology exams, x-rays, etc.		GS72		
502	All About Kids and Families Medical Center and James Joyner, M.D. medical records related to Christopher Cooper, including, all clinical summaries, office encounters, laboratory tests, x-rays, pulmonary function tests, radiology exams, etc.		GS74		
503	Floyd Buras, M.D. medical records related to Christopher Cooper, including, all clinical summaries, office encounters, laboratory tests, x-rays, pulmonary function tests, radiology exams, etc.		GS75		
504	Edward Shwery, PhD. medical records related to Christopher Cooper, including, all clinical summaries, office encounters, laboratory tests, x-rays, pulmonary function tests, radiology exams, etc.		GS76		
505	Richard LeBoeuf, M.D. medical records related to Christopher Cooper, including, all clinical summaries, office encounters, laboratory tests, x-rays, pulmonary function tests, radiology exams, etc.		GS78		
506	Janet Barnes, M.D. medical records related to Christopher Cooper, including, all clinical summaries, office encounters, laboratory tests, x-rays, pulmonary function tests, radiology exams, etc.		GS79		
507	Walgreen's Pharmacy Records related to Christopher Cooper and Alana Alexander.		GS80		

508	Children's Hospital medical records related to Christopher Cooper, including, all clinical summaries, office encounters, laboratory tests, emergency room records, outpatient records, inpatient records, radiology exams, x-rays, etc.		GS81		
509	KIPP McDonough 15 School for the Creative Arts Records in any way related to the employment of Alana Alexander, including, all information related to her work as a para-educator, teaching intern, para-professional, teacher, instructional coach, disciplinarian, etc.		GS82		
510	Cole P, Rodu B: Declining cancer mortality in the United States, <i>Cancer</i> , 78:2045-2048, 1996.		GS83		
511	Cole P: Causality in epidemiology, health policy and law. <i>Environmental Law Reporter</i> , 26 (6): 10279-10285, 1997.		GS84		
512	P, Axten C: formaldehyde and leukemia: An improbable causal relationship. <i>Regul Toxicol Pharmacol</i> , 40:107-112, 2004.		GS85		
513	Cole P, Morrison A: Basic issues in population screening for cancer. <i>J Natl Cancer Inst</i> , 64:1263-1272, 1980.		GS86		
514	Formaldehyde, 2-Butoxyethanol and 1-terbutoxypropan-2-ol. <i>IARC Monographs of the Evaluation of Carcinogenic Risks to Humans</i> , Vol. 88, 2006.		GS87, P		
515	Rodu B. Cole P: The fifty-year decline of cancer in America. <i>J Clin Oncol</i> , 19:239-241, 2001.		GS89		
516	National Center for Health Statistics. Compressed mortality files 1979-1998 and 1999-2005. CDC WONDER On-line Database.		GS90		
517	National Cancer Institute: <i>Surveillance, Epidemiology and Ed Results: Cancer Incidence Limited-Use Database</i> , 1973-2005		GS91		
518	Cole P, Sateren W: The evolving picture of cancer in America. <i>J Natl Cancer Inst</i> , 87:159-160, 1995.		GS92		
519	American Cancer Society Website: www.cancer.org/docroot/PED_2_3X_cancer_detection_guidelines_36.asp		GS94		

520	United States Preventive Services Task Force Website: www.ahrq.gov/clinic/cps3dix.htm#cancer		GS95		
521	Miller A: Fundamental issues in screening for cancer. Chapter 66 in: <i>Cancer Epidemiology and Prevention</i> , Schottenfeld D, Fraumeni J (eds.), second ed., Oxford University Press, New York: 1996.		GS96		
522	2004 Invoices, packing slips, delivery tickets, and receipts for materials shipped by vendor, Genesis Products, Inc. to JEJ Molding/ Fairmont Homes and Fairmont/Gulf Stream Plant #12.	GULF0006370 - GULF0006396; GULF0006559 - GULF0006670).	GS97		
523	2004 Invoices, packing slips, delivery tickets, and receipts for materials shipped by vendor, Patrick Fabricated Metals to Gulf Stream Coach Plants/Fairmont Homes Plants/JEJ Molding.	GULF0006397 - GULF0006423	GS98		
524	2004 Invoices, packing slips, delivery tickets, and receipts for materials shipped by vendor, Robert Weed Plywood Corporation to Gulf Stream Coach Plants/Fairmont Homes Plants/JEJ Molding	GULF0006207 - GULF0006369; GULF0006424 - GULF0006558	GS99		
525	2004 Invoices, packing slips, delivery tickets, and receipts for materials shipped by vendor, MJB Wood Product Group, Inc. to Gulf Stream Coach Plants/Fairmont Homes Plants/JEJ Molding	GULF0006124 - GULF0006206	GS100		
526	2004 Invoices, packing slips, delivery tickets, and receipts for materials shipped by vendor, Universal Forest Products, Inc. to Gulf Stream Coach Plants/Fairmont Homes Plants/JEJ Molding	GULF0005693 - GULF0005696; GULF00058509 - GULF0006068	GS101		
527	2004 Invoices, packing slips, delivery tickets, and receipts for materials shipped by vendor, Adorn, L.L.C. to Gulf Stream Coach Plants/Fairmont Homes Plants/JEJ Molding.	GULF0006069 - GULF0006112	GS102		
528	2004 Invoices, packing slips, delivery tickets, and receipts for materials shipped by vendor, Wood Bridge, Inc. to Gulf Stream Coach Plants/Fairmont Homes Plants/JEJ Molding.	GULF0006113 - GULF0006123	GS103		

529	2004 Invoices, packing slips, delivery tickets, and receipts for materials shipped by vendor, BlueLinx Corporation to Gulf Stream Coach Plants/Fairmont Homes Plants/JEJ Molding.	GULF0005689 - GULF0005692	GS104		
530	2004 Invoices, packing slips, delivery tickets, and receipts for materials shipped by vendor, ESCO Industries to Gulf Stream Coach Plants/Fairmont Homes Plants/JEJ Molding.	GULF0005697 - GULF0005704	GS105		
531	2004 Invoices, packing slips, delivery tickets, and receipts for materials shipped by vendor, Hambro Forest Products, Inc. to Gulf Stream Coach Plants/Fairmont Homes Plants/JEJ Molding	GULF0005705 - GULF0005791	GS106		
532	2004 Invoices, packing slips, delivery tickets, and receipts for materials shipped by vendor, Viking Forest Products, Inc. to Gulf Stream Coach Plants/Fairmont Homes Plants/JEJ Molding	GULF0005792 - GULF0005828	GS107		
533	2004 Invoices, packing slips, delivery tickets, and receipts for materials shipped by vendor, Seaboard International Forest Products, Inc. to Gulf Stream Coach Plants/Fairmont Homes Plants/JEJ Molding.	GULF0005829 - GULF0005849	GS108		
534	2004 Invoices, packing slips, delivery tickets, and receipts for materials shipped by vendor, CJ Plastics/ECKCO Plastics to Gulf Stream Coach Plants/Fairmont Homes Plants/JEJ Molding		GS109		
535	Property Transfer Reports	FEMA154- 000047 - FEMA154- 000054	GS113		
536	Agency for Toxic Substances and Disease Registry, Managing Hazardous Materials Incidents, Medical Management Guidelines for Acute Chemical Exposure, Formaldehyde. Atlanta, ATSDR, 2001.		GS114		
537	Declaration of Joseph D. Little attached to defendant, United States of America's Motion to Dismiss Plaintiffs' Remaining FTCA claims for Lack of Subject Matter Jurisdiction (U.S. Exhibit No. 40). Joe Little Deposition Exhibit No. 2		GS116		

538	FEMA: Important Formaldehyde Information for FEMA Housing Occupants	FEMA08-000015	GS119		
539	Judith Reilly email dated 4/14/06	FEMA 17-024461	GS121		
540	Michael Miller email dated 6/2/06	FEMA 17-022662	GS122		
541	Runge email dated 11/2/07	FEMA 17-016084	GS123		
542	Ryan Buras email dated 5/17/07	FEMA 17-009113	GS124		
543	FEMA Talking points	FEMA 17-023963	GS125		
544	Martin McNeese email dated 10/11/06	FEMA 17-000029	GS126		
545	Martin McNeese email dated 3/5/07	FEMA 17-003608	GS127; F7		
546	Curtis Melnick email dated 5/11/06 Miller Deposition Exh. 22)		GS128		
547	FEMA 17-010774	FEMA17-010774	GS130		
548	Internal FEMA emails regarding OSHA testing and media publicity	FEMA 17-003621-25	GS131		
549	Internal FEMA emails regarding formaldehyde response	FEMA 17-022367-71	GS132		
550	FEMA 17-009065, 009067	FEMA 17-009065, 009067	GS133		
551	FEMA 17-018456	FEMA 17-018456	GS134		
552	FEMA 17-002096	FEMA17-002096	GS135		
553	FEMA 17-008401	FEMA 17-008401	GS136		
554	DeVany Summary of Sierra Club results	FEMA 123-000003	GS137		
555	DeVany memo on bake-off procedure	FEMA 123-000007-8	GS138		
556	DeVany attachment to Becky Gillette letter to David Garratt.		GS139		
557	3/31/06 Memo from Bronson Brown to Jesse Crowley regarding formaldehyde testing, bates	FEMA 10-0001630164	GS140		
558	10/5/05 email from Christopher Smith to Clyde Payne, OSH 001-004338 re: formaldehyde off-gassing		GS141		

559	Prospective Study of the Respiratory Effects of Formaldehyde Among Healthy and Asthmatic Medical Students. Authored by Grant Uba, MD, et al. (American Journal of Industrial Medicine 15:91-101 (1989)).		GS142		
560	Airway Response to Formaldehyde Inhalation in Asthmatic Subjects with Suspected Respiratory Formaldehyde Sensitization. Authored by Anna Krakowiak, MD, et al. (American Journal of Industrial Medicine 33:274-281 (1998)).		GS143		
561	Effect of Formaldehyde on the Mucus Membranes and Lungs – A Study of an Industrial Population. Authored by Edward Horvath, Jr., MD, MPH, et al. (JAMA February 5, 1988 – Vol. 259, No. 5).		GS144		
562	Correspondence from Patrick Logue (Industrial Hygienist) Employee Formaldehyde Exposure Assessment/ Raleigh with attached recommended occupational exposure limit for formaldehyde based on irritation (FL-FDA-025835).		GS145		
563	Entergy billing record/billing invoice summary for 4415 Dale Street from January 2004 – June 2008.		GS146		
564	E-Mail History of Formaldehyde – Request from FEMA DHOPS Brian Boyle	FL-FDA-025831	GS147		
565	Schematics of Alexander/Cooper THU Model.		GS148		
566	Formaldehyde Indoors – Use reconstituted wood products with lower emissions. Authored by Stephen Smulski; April 1987	ALX-EXP-73-000175 - ALX-EXP-73-000177	GS149		
567	Correspondence from Mikal Watts to Dr. Janet Barnes dated May 5, 2009 regarding Chris Cooper – studies regarding formaldehyde and childhood asthma.	ALX-EXP-73-000005 - ALX-EXP-73-000006	GS150		
568	Photographs of Alexander/Cooper THU.		GS151		
569	Ad for former Gulf Stream Coach, Inc. employees		GS152		
570	Handwritten notes of Dr. Smulski referencing conversations with Plaintiffs' counsel		GS153		
571	Part "A" of the FEMA DAP Contract signed by Alana Alexander	FEMA137-000057	GS155		

572	ADORN purchase orders, billing statements, and invoices	GULF0006069-6112	GS156		
573	Jeffrey Zumbum Recorded Statement with Scott Bailey (Exhibit 2, Depo. of Scott Bailey (7/31/09)) -		GS157		
574	SC 05238 - DeVany 3/8/08 email regarding direct read instruments		GS158		
575	SC 05235-37 - DeVany 4/18/08 email to Oliver Bernstein with attachments		GS159		
576	Correspondence from Patrick Preston (FEMA-OCC) to Scott Wright (ATSDR) dated November 30, 2006 regarding FEMA Trailer Formaldehyde Litigation (Ex. 15 to Depo. of Chris DeRosa taken 7/6/09)		GS160		
577	Risher, John and DeRosa, Christopher Correspondence from Patrick Preston (FEMA-OCC) to Scott Wright (ATSDR) dated November 30, 2006 regarding FEMA Trailer Formaldehyde Litigation (Ex. 22 to Depo. of Chris DeRosa taken 7/6/09)		GS161		
578	Assessment of Health Complaints among Pediatric Residents of FEMA-Supplied Trailers and Mobile Homes in Hancock County, Miss (Ex. 17 to Michael Lapinski's Depo. taken on 7/24/09)		GS162		
579	Fact Sheet: Assessment of Health Complaints Among Children Living in FEMA Temporary Housing Units in Hancock County, Mississippi (Ex. 16 to Michael Lapinski's Depo. taken on 7/24/09)		GS163		
580	All documents produced by Gulf Stream Coach, Inc		GS164		
581	All documents attached to any depositions.		GS165		
582	All exhibits listed by any other party.		GS166		
583	Alana Alexander's phone records for cellular phone number (504) 577-0737.	FL-FCA 007307 - 007577	F1		

584	All photographs of 4415 Dale Street, New Orleans, LA taken at any time from 2005 to the present, including without limitation, all photographs of the movement and relocation of the Alexander travel trailer in July of 2007.	Plaintiff produced photos that are not bates numbered. GS_A.Alexander 000030-64 DOJ-A.Alexander 000001 to 000031 FL-FCA-006953 to 007025	F2		
585	FRRATS Screen Shots for Alana Alexander and tracking history on trailer from FEMA	FEMA10-002095 to 002119 FGC041-000001 to 000003 FGC006-000098 to 000105	F6		
586	The IA-TAC Contract between Fluor Enterprises, Inc. and FEMA, including Task Order No. 20 related to haul and install activities.	FL-FCA-00001 to 000395	F8		
587	Subcontract with MLU	FL-FCA-002869 to 002986	F9		
588	All revisions of the Fluor Installation Manual	FL-FCA-004636 to 006912 FL- FCA-006941 to 006952 FL-FCA- 017573 to 017616	F10		
589	FEMA Trailer Inspections Field Inspector's Guide	FL-FCA-006913 to 006940	F11		
590	Fluor's Project Procedures Manual, to the extent applicable to Task Order 20/haul and install work.	FL-FCA-024494 to 024867	F12		
591	Fluor's Project Execution Plan, to the extent applicable to Task Order 20/haul and install work.	FL-FCA-020841 to 020971	F13		
592	Work Plans relevant to Task Order No. 20/haul and install work.	FL-FCA-024017 to 024026 FL-FCA-025318 to 025332	F14		
593	Estimates, budgets and basis of estimates as relates to the IA-TAC Contract and Task Order No. 20/haul and install work, but only if and to the extent necessary to rebut inaccurate allegations concerning monies paid to Fluor under the IA-TAC contract.	FL-FCA-017706 to 017709 FL-FCA-017713 to 017714	F15		

594	Acceptance of Task Order 20.	FL-FCA-019669 to 019670	F16		
595	Project job bulletins to Fluor employees	FL-FCA 013759 FL-FCA-017525 FL-FCA-018038 to 018044 FL-FCA-018080 to 018082 FL-FCA-018091 to 018092 FL-FCA-019352 to 019355	F17		
596	Any training materials to the extent relevant to Task Order No. 20/haul and install work.	FL-FCA-018626 to 018652 FL-FCA-019369 Fto 019374 FL-FCA-019456 to 019471 FL-FCA-019478 to 019484 FL-FCA-019969 to 019986 FL-FDA-025454 to 025459 FL-FDA-025479 to 025525 FL-FDA-025530 to 025555 FL-FDA-025695 to 025752	F18; P544		
597	Fluor Quality Assistance/Quality Control Plan	FL-FCA-007140 to 007158	F19		
598	Fluor Task Order Completion Report	FL-FCA-026164 to 025270	F20		
599	Fluor Work Plan Completion Task Order 20	FL-FCA-025132 to 025153	F21		
600	Fluor monthly reports to the extent relevant to Task Order No. 20/haul and install work.	FL-FCA-022789 to 022803	F22		
601	Fluor daily reports to the extent relevant to Task Order No. 20.	FL-FCA-018885 to 018896 FL-FCA-018899 to 018900 FL-FCA-018903 to 018908	F23		

602	All documents contained in the reliance files of any expert disclosed by any party to these proceedings.		F24		
603	Documents regarding formaldehyde from Patrick Logue, FEI's Health & Safety Director	FL-FCA-026631 to 026641 FL-FCA-026654 to 026657 FL-FCA-026662 to 026666 FL-FCA-027620 to 027626 FL-FCA-02776 to 027762 FL-FCA-028114 to 028148	F25		
604	Series of emails from and to Marcus Tikotsky regarding blocking of travel trailers in October 2005	FL-FCA-019621 to 019624 FL-FCA-020299 to 020301 FL-FCA-020302 to 020306 FL-FCA-020307 to 020308	F27		
605	Email regarding no blocking required in 9-05.	FL-FCA-020347	F28		
606	Email from Kevin McCarthy dated 10/17/2005 regarding "Technical Direction for Fluor in LA: Blocking Diagram," with attached blocking diagram, and related email chain.	FL-FCA-007178 to 007179	F29		
607	Email from Kevin McCarthy dated 10/18/2005 regarding "Confirmation of Technical Direction for Fluor in LA: Travel Trailer Blocking Requirement," and related email chain.	FL-FCA-007180 to 007182 FL-FCA-007183 to 007185	F30		
608	FYI Link Newsletter regarding 9 million safe work hours	FL-FCA-017495 to 017436	F31		
609	Fluor's Technical Direction Log.	FL-FCA-007186 to 007305	F32		
610	Toolbox Training/Proper Jacking Techniques and such further documents needed to clarify context and use of same.	FL-FCA-007306	F33		

611	Fluor Government Group's Health, Safety & Environmental Program Documentation, including safety forms, for FEMA Project-All Locations		F34		
612	Fluor Safety Incident Reports, Monthly Incident Experience Reports	FL-FCA-018487 to 018512	F35		
613	Fluor's Director's Committee Weekly Safety Meeting Reports and OSHA 300 logs (or alternatively all such reports to rebut inaccurate claims concerning worker reporting of formaldehyde issues)	FL-FCA-018833 to 018844	F36		
614	Fluor's Daily Reports to FEMA Headquarters (or alternatively all such reports to rebut inaccurate claims concerning Fluor knowledge of formaldehyde issues or blocking/jacking issues)	FL-FCA-018885 to 018896 FL-FCA-018899 to 018900 FL-FCA-018903 to 018908	F37		
615	Fluor's Weekly Reports to FEMA Headquarters (or alternatively all such reports to rebut inaccurate claims concerning Fluor knowledge of formaldehyde issues or blocking/jacking issues)	FL-FCA 009759 to 009798 FL-FCA-012723 FL-FCA-012725 to 012727	F38		
616	FEMA "D+" Reports (or alternatively all such reports to rebut inaccurate claims concerning Fluor knowledge of formaldehyde issues or blocking/jacking issues)	FL-FCA-018461 to 018474 FL-FCA-019597 to 019610.	F39		
617	Fluor Job Safety Bulletins related to Health, Safety and Environmental issues.	FL-FCA-018040 to 018047 FL-FCA-018080 to 018090	F40		
618	Fluor Safety Meeting Minutes	FL-FCA-018250 to 018251	F41		
619	Fluor Job-Specific Safety Analysis/Activity Hazard Analysis Forms as completed.	FL-FCA-018569 to 018625	F42		
620	Fluor's Safety Task Assignment, FEMA IA Project—Hurricane Relief.	FL-FCA-019369 to 019374	F43		
621	An Introduction to the "Five-Step Process" of Job Safety Analysis (JSA).	FL-FDA-025382 to 025388	F44		
622	Travel Trailer Setup Inspection Support Guidance.	FL-FCA-019666 to 019668	F45		
623	Contractor/Subcontractor Site Safety Guidelines.	FL-FCA-018626 to 018652 FL-FCA-019486 to 019513	F46		

624	Fluor's Health, Safety and Environmental Zero Incidents Program.	FL-FCA-018807 to 018813	F47		
625	Site Assessment, Trailer Installation and Quality Control Training.	FL-FCA-019969 to 019986 FL-FCA-020019 to 020049	F48		
626	Travel Trailer Training Syllabus.	FL-FCA-019987 to 019992	F49		
627	Haul and Install Training.	FL-FDA-025454 to 025459	F50		
628	Any documents produced, exchanged or reviewed in these MDL proceedings, including without limitation in the <i>Age</i> case, in any other constituent case of the MDL, and in the MDL generally, including all discovery that took place during the class certification phase (hereafter "these MDL proceedings").		F52		
629	Any documents identified in any discovery responses of any party to these MDL proceedings.		F53		
630	Any exhibits to every deposition taken in these MDL proceedings.		F54		
631	Any documents identified by any witness in any deposition or hearing in these MDL proceedings.		F55		
632	Any documents entered as exhibits in any hearing in these MDL proceedings, including without limitation, the hearing on the Plaintiffs' Motion for Class Certification.		F56		
633	Any documents attached as an exhibit to any pleadings filed in these MDL proceedings.		F57		
634	Any pleading or paper filed in these MDL proceedings.		F58		
635	FEMA Katrina Task Order description list.	FL-FCA-007177	F59		
636	Email regarding technical direction from Fluor to use certain wood grain for blocking	FL-FCA-009615 FL-FCA-009521	F61		
637	Email from Kevin McCarthy to Fluor regarding technical direction from Fluor in blocking	FL-FCA-009634 to 009635	F62		
638	Emails regarding height of pier blocking construction	FL-FCA-011734 to 011735	F63		
639	Performance work statement for maintenance and deactivation of manufactured homes and travel trailers	FL-FCA-022804 to 022834	F64		

640	Emails regarding COTR's responsibility to IA-TAC contractors	FL-FCA-013026 to 013034	F65		
641	Additional emails regarding blocking for travel trailers directed by IA-TAC	FL-FCA-016669 to 016671 FL-FCA-016682 to 016684	F66		
642	Emails related to travel trailer set-up	FL-FCA-016841 to 016843 FL-FCA-016846 to 016848 FL-FCA-016790 to 016792 FL-FCA-016700 to 016702 FL-FCA-016690 to 016695 FL-FCA-009437 to 09441	F67		
643	Catastrophic housing decision and implementation guide March 2005	FL-FCA-023857 to 024186 FL-FCA-016874	F68		
644	News article regarding trailer order falls short dated 10.30.05	FL-FCA-017358 to 017362	F69		
645	Slide show on Fluor Hurricane Katrina/Rita response effort update 12.19.05	FL-FCA-017889 to 017932	F70		
646	Fluor's government group lock out – tag out program from the Fluor safety and health program that establishes the requirements for locking and tagging equipment and systems to protect personnel, property and environments from events	FL-FCA-019433 to 019455	F71		
647	FEMA internal documents regarding formaldehyde	FEMA 17-000026 to 000619 FEMA 17-002196 to 002201 [Less 103 to 159] [Less 160 to 188] [Less 392 to 406] [Less 407 to 415]	F72		
648	Any documents concerning formaldehyde attached to depositions of FEMA employees		F73		
649	Any documents listed by plaintiffs regarding FEMA's knowledge of formaldehyde		F74		
650	Emails regarding Katrina and Rita housing estimate dated 11.01.05	FL-FCA 024211 to 024212	F75		

651	Emails regarding Cavalier Travel Trailers	FL-FCA 018974 to 018975	F76		
652	Additional entries re formaldehyde testing conducted by Fluor	FL-FCA 019328 FL-FCA 025103 to 0285104 FL-FCA 025281 to 025284	F77		
653	Drawing attached to Shirley Alexander's Deposition		F78		
654	Inspection reports attached to Angela Baksh's deposition		F80		
655	Inspection Reports from Keith Jupiter		F81		
656	Any Photographs attached to Shirley Alexander's Deposition including the photograph produced in response to Subpoena Duces Tecum showing Mold at residence of Alana Alexander & Christopher Cooper	Not Bates Numbered	F82		
657	Any photographs attached to any deposition		F83		
658	Emails regarding Fluor's response to formaldehyde after FEMA put Fluor on notice of such issue	FL-FCA 028292 FL-FCA 028188 to 028189 FL-FCA 028176 FL-FCA 028203 to 028204 FL-FCA 028205 to 028207 FL-FCA 028209 to 028212 FL-FCA 028213 to 028217 FL-FCA 028229 to 028232 FL-FCA 028294 to 028296 FL-FCA 028256 to 028257	F84		
659	Script for Formaldehyde Concerns in Temporary Housing Unit: IA recipients with questions about formaldehyde July 2007	FEMA09-000402 FEMA09-000407	F86		
660	Applicants Reporting MH/TT Formaldehyde Issues: IA recipients with questions about formaldehyde July 2007	FEMA09-000378 FEMA09-000383	F87		

661	Important Formaldehyde Information for FEMA Housing Occupants for occupants living in EHU's July 2007	FEMA09-000388 FEMA09-000389	F88		
662	Memo. for FEMA Temporary Housing Agent Group: Occupants with questions about formaldehyde July 2007 (re: Formaldehyde-Helpline Calls, Referrals and Transfers)	FEMA10-000386 FEMA10-000390	F89; F85		
663	Flyer: CDC Will Test Trailers and Mobile Homes for Formaldehyde for CDC partners such as community organizations in LA and MS, Dec. 2007	CDC-000084	F90		
664	Letter from Edward A. Broyles to Justin Woods 04/07/09 regarding administrative tort claim of Alana Alexander, 08004644 stating determination of claim	FEMA-000959	F91		
665	Excerpt from MSNBC Jayco Video showing set up of trailer		F92		
666	Cooper Medical Records (Children's Hospital)	GS_C.Cooper-000001- GS_C.Cooper-000039	F93		
667	Children's Hospital Records	GS_C.Cooper-000001- GS_C.Cooper-000039	F94		
668	Kipp School Records	GS_C.Cooper-000074- GS_C.Cooper-000082	F95		
669	School Medical Records	GS_C.Cooper-000083- GS_C.Cooper-000088	F96		
670	Walgreens Pharmacy Records	GS_C.Cooper-000089- GS_C.Cooper-000134	F97		
671	Chris Cooper's Birth Certificate		F98		
672	FEMA Press Release: Hurricane Katrina, One Year Later	FEMA10-000340 - FEMA10-000341	F99		

673	FEMA Reforms Maintenance and Deactivation of Housing Contracts Post Katrina; http://www.fema.gov/media/fortherecord.shtm		F100		
674	Formaldehyde Timeline, dated April 7, 2008	FEMA10-000325-337	F101		
675	Photographs taken of Trailer at issue	FL_A.Alexander 000001-83 DLC- A.Alexander 000001-74 PL_A.Alexander 000001-349	F103		
676	Deposition Exhibits to FEI's Corporate Deposition		F104		
677	Deposition Exhibits to Richard Sober's Deposition		F105		
678	Expert Report of Michael Lindell		P		
679	Expert Report of Richard Monson		P		

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

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

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

THIS DOCUMENT IS RELATED TO

*Charlie Age, et al v. Gulf Stream Coach
Inc., et al*, Docket No. 09-2892;
Alana Alexander, individually and on behalf of
Christopher Cooper

* * * * *

PARTIES' JOINT WITNESS LIST

1. PLAINTIFF'S WILL CALL WITNESS LIST

<u>WITNESS</u>	<u>SUBJECT</u>	<u>LIVE/VIDEO</u>
a. Abbott, Eddie	GSC Engineering Manager	Video
b. Alexander, Alana	Plaintiff	Live
c. Alexander, Erika	Sister/Daughter of Plaintiffs	Live
d. Allen, Heath	Fluor Sub-Contractor	Video
e. Allen, Travis	Fluor Sub-Contractor	Video
f. Bailey, Scott	E/E Adorn/Patrick Supplier GSC	Video
g. Baksh, Angela	Inspected Unit/SOP Inspect	Video
h. Barnes, Dr. Janet	PSC Expert/Treating Doctor	Live
i. Blanchard, Terry	Fluor Sub-Contractor	Video
j. Brown, James R.	Head Receiver GSC	Video
k. Cooper, Christopher	Plaintiff Minor, 12 years old	Live

l. Davis, Alan	Former GSC E/E	Video
m. DeRosa, Chris	Non-Retained Expert, Former CDC/ATSDR	Live
n. Devany, Mary	PSC Expert Testing/Liability	Live
o. Duckworth, Robert	Fluor Safety Manager	Live
p. Durham, Dwight	Fluor	Video
q. Esparza, Linda	Former GSC E/E	Video
r. Freiberger, Don	Former GSC E/E	Live
s. Freiberger, Karen	Former GSC E/E	Live
t. Hewett, Paul	PSC Expert, Statistics	Live
u. Jacquez, Frank	Former GSC E/E	Live
v. Kaltofen, Marco	PSC Expert, Testing, Database	Live
w. Keel, Burl	GSC Plant Manager	Video
x. Kornberg, Dr. Jim	PSC Expert, Med. Monitoring, Causation	Live
y. Lemieux, Darryl	Fluor Sub-Contractor	Live
z. Linares, Hugo	Fluor E/E	Live
aa. Mallet, Al	PSC Expert Trailer Constr.	Live
bb. McCreary, Patrick	Former GSC E/E	Live
cc. McGwin, Dr. Gerald	PSC Expert – Epidemiology	Live
dd. Methot, Dave	Fluor E/E	Video
ee. Moore, Charles David	PSC Expert Test/Trailer Frame Bent	Live
ff. Pullin, Scott	VP Operations GSC	Video

gg. Ritter, Ervin	PSC Expert Heat/AC	Live
hh. Scott, Jeremiah	Christopher Cooper's Coach	Live
ii. Scott, William	PSC Expert, Tested Unit	Live
jj. Shaffer, Don	Former GSC E/E	Live
kk. Shea, Dan	President motor Unit GSC	Video
ll. Shea, Jim – Depo #1	Chairman Gulf Stream	Video
mm. Shea, Jim	CEO GSC	Video
nn. Shwery, Dr. Ed	PSC Expert, Psychologist	Live
oo. Slone, Terry	Former GSC E/E	Video
pp. Smulski, Stephen	PSC Expert Wood Science	Live
qq. Sober, Richard	Fluor E/E	Video
rr. Timmins, Kyle	Receiver GSC	Video
ss. Williams, Patricia	PSC Expert, Toxicology	Live
tt. Zumbrun, Jeff	Purchasing Manager GSC	Video

PLAINTIFF'S MAY CALL WITNESS LIST

<u>WITNESS</u>	<u>SUBJECT</u>	<u>LIVE/VIDEO</u>
a. Alexander, Shirley	Mother/Grandmother	Live/Video
b. Mayor, Dr. Tom	PSC Expert, Economist	Live

WITNESSES TO BE CALLED BY GULF STREAM COACH, INC.

<u>WITNESS</u>	<u>SUBJECT</u>	<u>LIVE/VIDEO</u>
a. Pullin, Scott	Fact witness	Live/Video
b. Wedner, Dr. James	Expert	Live
c. Dyson, Dr. William	Expert	Live
d. Serauskas, Damien	Expert	Live
e. Cole, Dr. Phillip	Expert	Live
f. Allan, Dr. Graham	Expert	Live
g. Ciota, Dr. Megan	Expert	Live
h. Zumbrun, Jeff	Fact	Live
i. Sarvari, Phillip	Fact	Live
j. James, Dr. Robert	Expert Toxicologist	Live
k. Herzstein, Dr. Jessica	Expert - Medical Mon.	Live
l. Cleland, Joseph	Fact	Video
m. Pacheco, Dr. Karen	Expert	Video
n. Souza, Kevin	Fact	Video
o. Little, Joe	Fact/Expert	Video
p. Miller, Steve	Fact	Video
q. McNeese, Martin	Fact	Video
r. Lentych, Todd	Fact	Video

WITNESSES THAT MAY BE CALLED BY GULF STREAM COACH, INC.

<u>WITNESS</u>	<u>SUBJECT</u>	<u>LIVE/VIDEO</u>
a. Harder, Michael	Fact	Video
b. Larsen, Stanley	Fact	Video
c. Bonomo, Gary	Fact	Video
d. Garratt, David	Fact	Video

WITNESSES TO BE CALLED BY FLUOR ENTERPRISES, INC. - (although some are expected to testify during Plaintiff's case)

a. Gay, Cam	Live	May Call
b. Ulm, Billy	Live	May Call
c. Lemieux, Dan	Live	May Call
d. Lemieux, Daren	Live	May Call
e. Medina, Raul	Live	May Call
f. Hodge, Van	Live	May Call
g. Morton, Gloria	Live	May Call
h. Quick, Leonard	Live	Will Call
i. Rammell, Jim	Live	May Call
j. Bukowski, Robert	Live	May Call
k. Repasky, Tom	Live	May Call
l. Belote, Richard	Live	Will Call
m. Whitaker, Al	Live	Will Call

n. Linares, Hugo	Live	Will Call
o. Methot, Dave	Live	Will Call
p. Sober, Richard	Live	May Call
q. Berger, Chuck	Live	May Call
r. Durham, Dwight	Video	May Call
s. Duckworth, Robert	Live	Will Call
t. Baksh, Angela	Live	May Call

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