

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

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

SHAW ENVIRONMENTAL, INC.’S EXHIBIT LIST

NOW INTO COURT, through undersigned counsel, comes Shaw Environmental, Inc. (“Shaw”), and pursuant to the Court’s Scheduling Order, hereby submits the following preliminary exhibit list:

| EXHIBIT # | EXHIBIT DESCRIPTION |
|-----------|---|
| 1. | The Individual Assistance / Technical Assistance Contract (“IA/TAC”) between FEMA and Shaw Environmental, Inc. [Contract No. HSFHQ-05-D-0573] including all Task Orders, Amendments, Attachments, Statements of Work, and Work Plans [SHAW 000373–001142] |
| 2. | Ready for Occupancy Status Form [SHAW-WRI 00001] |
| 3. | Agreement to Rules of Occupancy [SHAW-WRI 00002] |
| 4. | Applicant Pending Inspection Form [SHAW-WRI 00003] |
| 5. | Landowner’s Authorization / Ingress-Egress Agreement [SHAW-WRI 00004] |

| | |
|-----|---|
| 6. | Site Description Schematice [SHAW-WRI 00005] |
| 7. | Site Description by M.B. Wethington [SHAW-WRI 00006] |
| 8. | Temporary Housing Unit Inspection Report [SHAW-WRI 00007] |
| 9. | FEMA Unit Inspection Report [SHAW-WRI 00008] |
| 10. | Trailer Lease Check In List [SHAW-WRI 00009] |
| 11. | RFO Checklist [SHAW-WRI 00010] |
| 12. | Bobbie Wright Ready for Occupancy Check List [SHAW-WRI 00011] |
| 13. | Shaw Notice [SHAW-WRI 00012] |
| 14. | Shaw Unit Installation Work Order [SHAW-WRI 00013] |
| 15. | Preventative Maintenance Inspection Form [SHAW-WRI 00014] |
| 16. | Call Center Maintenance Request Form [SHAW-WRI 00015–00016] |
| 17. | Call Center Maintenance Request Form [SHAW-WRI 00017] |
| 18. | Shaw applicant data record for Bobbie Wright [SHAW-WRI 00018] |
| 19. | FEMA Temporary Housing Unit Inspection Report [SHAW-WRI 00022] |
| 20. | Shaw / FEMA Travel Trailers Leaving FEMA Yard form [SHAW-WRI 00023] |
| 21. | Temporary Housing Unit Inspection Report [SHAW-WRI 00024] |
| 22. | Manhattan Site Trailer Delivery List [SHAW-WRI 00025] |
| 23. | Unit Delivery Ticket [SHAW-WRI 00026] |
| 24. | Temporary Housing Unit Inspection Report [SHAW-WRI 00027] |

| | |
|-----|---|
| 25. | AFO DHOPS Master Expedite List 3/31/06 [SHAW-WRI 00029] |
| 26. | RCG Enterprises bill with support on Wright trailer [SHAW-WRI 00030–00031] |
| 27. | RCG Invoice #9 with support on Wright trailer [SHAW-WRI 00032–00033] |
| 28. | Email from Pamela Wolfe to Allison Hansen with spreadsheet redacted to show Wright trailer [SHAW-WRI 00035–00037] |
| 29. | Daily Data Report 2/14/06 [SHAW-WRI 00039] |
| 30. | Daily Report spreadsheet showing Wright trailer [SHAW-WRI 00040–00041] |
| 31. | FRRATS spreadsheet showing Wright trailer [SHAW-WRI 00042–00048] |
| 32. | Shaw’s FEMA Maintenance Transition Report showing Wright trailer [SHAW-WRI 00049–00050] |
| 33. | Entergy Orleans Parish Applicants Meters Installed showing Wright trailer [SHAW-WRI 00051] |
| 34. | Bobbie Wright’s Individual Assistance file [FGC009-000012–000089] |
| 35. | Redacted FEMA spreadsheet reflecting Bar Code History [FGC041-000001] |
| 36. | Redacted FEMA spreadsheets regarding the Wright Unit [FGC041-000004–000008] |
| 37. | FRRATS Screens for Bobbie Wright’s Disaster Files [FEMA10-002283–002332] |
| 38. | Melville Travel Trailer Inspection Checklist and attached Reports [FGC009-000001–000011] |
| 39. | Photographs taken by FEMA on July 30, 2009, of the Wright Unit in Melville, LA [FEMA165-0000001–0000012] |
| 40. | Documents collected by FEMA on July 30, 2009, from within the Wright Unit in Melville, LA [FEMA165-0000013–0000187] |
| 41. | Photographs of Trailer at 2315 Seminole Lane |

| | |
|-----|---|
| 42. | Google Maps photographs of Trailer at 2315 Seminole Lane |
| 43. | Photographs of Trailer during inspections in Melville, Louisiana by various experts |
| 44. | Plaintiff Fact Sheets [LW-WRIGHT 000001–00030; 00031–00052] |
| 45. | Uptown Nephrology Records [LW-NEPH00001–00204] |
| 46. | Touro Infirmary Records pLW-TOURO00001–00019] |
| 47. | Jefferson Pulmonary Records [LW-EJGH00001–00041] |
| 48. | Worley records [LW-WORLEY 000001–000002] |
| 49. | Spector records [LWFR-EXP14-00265–00292; 000016–000042; 000081–000084] |
| 50. | IgE Serum Test Results [LWFR-EXP2-000025; 2-000046; 2-000050] |
| 51. | Walgreen’s records [LW-WAL00001–00026] |
| 52. | Rite Aid records [LW-RAID00001–00005] |
| 53. | Walter Cohen High School/Orleans Parish School Board Records |
| 54. | Wright discovery responses [LW-WRIGHT00053–00481] |
| 55. | Cigna records [LW-CIGNA00001–00092] |
| 56. | United Health Care records [LW-UNITED00001–00112] |
| 57. | Aetna Health Care records [LW-AETNA 00001–00039] |
| 58. | Riverland Credit Union records [LW-RIVERLAND00001–00253] |
| 59. | JP Morgan Chase records [LW-CHASE00001–00047] |
| 60. | Internal Revenue Service records [LW-IRS00001–00139] |

| | |
|-----|---|
| 61. | Social Security Administration records [LW-SSA00001-00013] |
| 62. | City of New Orleans employment records [LW-CTY NO00001-00256] |
| 63. | Hyatt records [LW-HYATT00001-00126] |
| 64. | Entergy records [LW-ENTERGY 00001-00125] |
| 65. | FEMA Spreadsheet [FEMA 162-0000356] |
| 66. | Forest River “traveler” file [FOREST 151924-151946] |
| 67. | Forest River Owner’s Manual [FOREST 2399-2483] |
| 68. | FEMA Trailer Procurement Specifications [FOREST 248588; 2490-2493] |
| 69. | Floor Plan for 32 BH FEMA Build Spec [FOREST 2501-2502] |
| 70. | Trailer schematics including but not limited to [FOREST 2511-2512; 169778] |
| 71. | Lawsuits regarding air quality at Civil District Court [LW-CDC00001-00024] |
| 72. | Materials Management Group study, documents and photographs [LW-MMG-00001-00060; FR-LTW-EXP08-001150-001275] |
| 73. | C. Martin Company records [LW-CMC-00001-00071] |
| 74. | A.M.E. Services, Inc. records [LW-AME-000001-007463] |
| 75. | Crown Roofing Services records [LW-CROWN00001-00016] |
| 76. | FEMA Flyer [LW-BONOMO00001-00002] |
| 77. | FEMA Important Formaldehyde Information [LW-LARSON00001] |
| 78. | Workplace Hygiene mold test results, formaldehyde test results, photos, and temperature/humidity data [FR-LTW-EXP04-000001-000567; EXP09-000169-000601] |

| | |
|-----|---|
| 79. | The Work Agreement between Shaw and RCG Enterprises, Inc. [SHAW 000285–000294] |
| 80. | Purchase Orders and related documentation regarding work under the IA-TAC subcontracted by Shaw to RCG Enterprises, Inc. [SHAW 001143–001443] |
| 81. | The Work Agreement between Shaw and Keta Group, LLC [SHAW 000215–000224] |
| 82. | Purchase Orders and related documentation regarding work under the IA-TAC subcontracted by Shaw to Keta Group, LLC [SHAW 001639–001844] |
| 83. | The Work Agreement, Purchase Orders and related documentation regarding work under the IA-TAC subcontracted by Shaw to Thompson Engineering, Inc. [SHAW 001444–001539] |
| 84. | The Work Agreement, Purchase Orders and related documentation regarding work under the IA-TAC subcontracted by Shaw to Pinnacle Transportation Systems, Inc. [SHAW 001540–001638] |
| 85. | Typical Travel Trailer Pier Construction [SHAW 002020] |
| 86. | Policies and Clarifications [SHAW 002128–002129] |
| 87. | Shaw RFO/Lease-In Forms [SHAW 002354–002359] |
| 88. | Maintenance Call Number [SHAW 005470] |
| 89. | FEMA Specs [SHAW 002277–002286] |
| 90. | Shaw SOP for PMIs [SHAW 013293–013303] |
| 91. | Email – Technical Direction to Shaw [SHAW 002333-34] |
| 92. | Email regarding trailer support blocks [SHAW 002967–002971] |
| 93. | Emails dated March 20-21, 2006 [SHAW 013510–013520; SHAW 013539–013545; and SHAW 013563–013568] |
| 94. | Memo regarding MDC Transfer Update, 6/3/06 [SHAW 001875–001876] |
| 95. | PowerPoint from meeting regarding MDC turnover June 3, 2006 [SHAW 001877–001889] |

| | |
|------|--|
| 96. | PowerPoint from meeting regarding MDC turnover May 18, 2006 [SHAW 001845-001874] |
| 97. | CV of John D. Osteraas, Ph.D., P.E. |
| 98. | CVs of Forest River and FEMA experts |
| 99. | John D. Osteraas, Exponent, Engineering Investigation – Lyndon Wright Trailer, Errata dated 11/17/09, and all documents referenced therein [SWE-000082-000164] |
| 100. | Data logger readings taken from the trailer while in Melville, LA, including [LWFR-EXP7-12293-12756] |
| 101. | Records reflecting readings or measurements taken by or at the direction of John Osteraas in Melville, LA |
| 102. | Records reflecting the results of tests performed on an exemplar trailer at the direction of John Osteraas |
| 103. | Photographs of the trailer while in Melville, LA, taken at the direction of John Osteraas |
| 104. | Video of the trailer testing conducted in Melville, LA at the direction of John Osteraas |
| 105. | Any and all documents produced after the date of this exhibit list |
| 106. | Any and all documents attached to any depositions |
| 107. | Any and all documents necessary for rebuttal |
| 108. | Any and all documents listed by any other party to this litigation |
| 109. | Any and all pleadings or motions, or attachments or exhibits thereto, filed in this litigation |

As both fact and expert discovery is ongoing, Shaw reserves the right to supplement and amend this exhibit list once discovery in this matter is completed and until finalization of the pre-trial order.

Respectfully submitted,

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

/s/ M. David Kurtz

M. DAVID KURTZ (#23821)
KAREN KALER WHITFIELD (#19350)
CATHERINE N. THIGPEN (#30001)
201 St. Charles Avenue, Suite 3600
New Orleans, Louisiana 70170
Telephone: (504) 566-5200
Facsimile: (504) 636-4000
dkurtz@bakerdonelson.com
kwhitfield@bakerdonelson.com
cthigpen@bakerdonelson.com

**ATTORNEYS FOR DEFENDANT,
SHAW ENVIRONMENTAL, INC.**

CERTIFICATE OF SERVICE

I hereby certify that on this the 12th day of January, 2010, I electronically filed the foregoing pleading using the Court's CM/ECF system, which sent notification of such filing to all court-appointed liaison counsel and counsel of record who are CM/ECF participants.

/s/ M. David Kurtz

M. DAVID KURTZ