

UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF LOUISIANA

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

SHAW ENVIRONMENTAL, INC.’S PRELIMINARY WITNESS LIST

NOW INTO COURT, through undersigned counsel, comes Shaw Environmental, Inc. (“Shaw”), and pursuant to the Court’s Trial Scheduling Order [Doc. No. 2716] hereby submits the following preliminary list of witnesses it may call at the trial of this matter:

NO.	WITNESS	TYPE OF WITNESS
1.	Kevin Souza	Fact
2.	Clifford Oliver	Fact
3.	Guy Bonomo	Fact
4.	Gary Keyser	Fact
5.	Stephen Miller	Fact
6.	Brian Boyle	Fact
7.	Stephen Deblasio	Fact

8.	Larry Woodruff	Fact
9.	Nancy Costello	Fact
10.	David Porter	Fact
11.	Johnathan Torres	Fact
12.	Mike Goetz	Fact
13.	Kathy Miller	Fact
14.	Joseph Little	Fact
15.	All FEMA Contracting Officers assigned to the Individual Assistance / Technical Assistance Contract ("IA/TAC") with Shaw.	Fact
16.	All Contracting Officers' Technical Representatives ("COTRs") assigned to the IA/TAC with Shaw.	Fact
17.	John Oстераas, Ph.D., P.E. Exponent	Expert
18.	Geoffrey C. Compeau	Fact
19.	Allison Hansen	Fact
20.	Jim Brixius	Fact
21.	Andrew Burgess	Fact
22.	Gary Quay	Fact
23.	Don Janz	Fact
24.	Kevin Neal	Fact
25.	Jimmy Screen	Fact
26.	Hab Karam	Fact
27.	Mike Noble	Fact
28.	Kevin Donnelly	Fact

29.	Representative(s) of C. Martin Company or any other maintenance and deactivation contractor (“MDC”) that was responsible for maintenance and/or deactivation of the Wright unit.	Fact
30.	Representative(s) of RCG Enterprises, Inc.	Fact
31.	Representative(s) of KETA Group, LLC	Fact
32.	Representative(s) of Thompson Engineering	Fact
33.	Representative(s) of Pinnacle	Fact
34.	Representative(s) of Lippert Components, Inc.	Fact
35.	Charles Field, M.D.	Fact/Expert
36.	Richard Spector, M.D.	Fact/Expert
37.	All medical providers or representatives of medical providers who provided medical care or services to Lyndon Wright.	Fact
38.	Representative(s) of Forest River, Inc.	Fact
39.	Doug Gaeddert	Fact
40.	Jeffrey Burian	Fact
41.	Elton Keifer	Fact
42.	Robert James, Ph.D. (USA Expert)	Expert
43.	Bruce Kelman, Ph.D. (USA Expert)	Expert
44.	Michael Lindell, Ph.D. (USA Expert)	Expert
45.	Richard Monson, M.D., Sc.D. (USA Expert)	Expert
46.	Mark Polk (USA Expert)	Expert
47.	Coreen Robbins, M.H.S., Ph.D., C.I.H. (USA Expert)	Expert

48.	G. Graham Allan, Ph.D. (Forest River, Inc. Expert)	Expert
49.	Philip Cole, M.D. (Forest River, Inc. Expert)	Expert
50.	Nathan T. Dorris, Ph.D. (Forest River, Inc. Expert)	Expert
51.	William L. Dyson, Ph.D., C.I.H. (Forest River, Inc. Expert)	Expert
52.	Thomas Fribley (Forest River, Inc. Expert)	Expert
53.	Norman Nelson (Forest River, Inc. Expert)	Expert
54.	Don Snell (Forest River, Inc. Expert)	Expert
55.	Kenneth B. Smith, M.D. (Forest River, Inc. Expert)	Expert
56.	John W. Thompson, M.D. (Forest River, Inc. Expert)	Expert
57.	Tony Watson, M.S.H.P., C.I.H., C.S.P. (Forest River, Inc. Expert)	Expert
58.	H. James Wedner, M.D. (Forest River, Inc. Expert)	Expert
59.	Lyndon Wright	Fact
60.	Bobbie Wright	Fact
61.	Lucretia Johnson	Fact
62.	Vanessa Johnson	Fact
63.	Michelle Wright	Fact
64.	Tyshawn Marsh	Fact
65.	Nicole Dison	Fact
66.	Tomika Zachary	Fact

67.	Any custodian of records necessary to authenticate documents to be entered into evidence.	Fact
68.	Any witness listed by any other party to this litigation.	Fact
69.	Any witness needed for rebuttal purposes.	Fact
70.	Any witness deposed in this MDL proceeding at any time.	Fact
71.	Any witness referred to or identified in any party's responses to interrogatories or other written discovery, or identified in any written discovery requests propounded on any party in this MDL proceeding.	Fact
72.	Any person mentioned in any deposition taken in this MDL proceeding.	Fact
73.	Any person identified in any document produced or exchanged in this MDL proceeding.	Fact

Shaw respectfully reserves the right to call any other witness who becomes known during discovery in this matter. Shaw further reserves the right to supplement and amend this preliminary witness list once discovery in this matter is completed.

Respectfully submitted,

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

/s/ M. David Kurtz

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

CERTIFICATE OF SERVICE

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

/s/ M. David Kurtz

M. DAVID KURTZ