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

IN RE: FEMA TRAILER

FORMALDEHYDE PRODUCTS LIABILITY LITIGATION

MDL NO. 1873

SECTION "N" (5)

**RELATES TO CIVIL ACTION NO. 09-2892** Age, et al. vs. Gulf Stream Coach, Inc., et al. (Alana Alexander/Christopher Cooper)

#### PLAINTIFFS' PRELIMINARY WITNESS LIST

NOW INTO COURT, through undersigned counsel, come Plaintiff, Alana Alexander, individually and on behalf of her minor child, Christopher Cooper, pursuant to this Honorable Court's Trial I Scheduling Order dated April 8, 2009 (Doc. No. 1305), who hereby

submit the following Preliminary Witness List in connection with the above captioned matter:

	Category:	Witness:	Type of Witness:	May/Will Call:
	Plaintiffs:			
1		Alana Alexander, individually and on behalf of her minor child, Christopher Cooper	Fact	Will Call
2		Christopher Cooper	Fact	May Call
	Experts:			
3		Janet D. Barnes, M.D.	Expert	
4		Lee Branscome, Ph.D., C.C.M.	Expert	
5		Gary Bunzer	Expert	
6		Mary C. DeVany, M.S., C.S.P., C.H.M.M.	Expert	

7		Paul Hewett, Ph.D.	Expert
8		Reagan Johnson	Expert
9		Marco Kaltofen, P.E.	Expert
10		James Kornberg, M.D., Sc.D.	Expert
11		Paul Lagrange	Expert
12		Lila Laux, Ph.D.	Expert
13		Alexis Mallet, Jr.	Expert
14		Thomas Mayor, Ph.D.	Expert
15		Gerald McGwin, Jr., Ph.D., M.S.	Expert
16		Charles David Moore, P.E., P.L.S.	Expert
17		Karin A. Pacheco, M.D., M.S.P.H.	Expert
18		Ervin Ritter, P.E.	Expert
19		William D. Scott, P.E., C.H.M.M.	Expert
20		Edward H. Shwery, Ph.D.	Expert
21		Stephen Smulski, Ph.D.	Expert
22		Patricia M. Williams, Ph.D., D.A.B.T.	Expert
	Medicals:		
23		Richard P. LeBoeuf, M.D. Medical Provider of Christopher Cooper	Fact/ Expert
24		Medical Records Custodian of National Jewish Hospital	Fact
25		Medical Records Custodian of Children's Hospital	Fact
26		Medical Records Custodian of University Hospital	Fact
27		Medical Records Custodian of Dr. Janet Barnes	Fact

28	Medical Records Custodian of Quest Diagnostics	Fact
29	Prescription Records Custodian of Walgreen's Pharmacy	Fact
30	Children's Hospital Staff: Mark Carlon, M.D.	Fact
31	Children's Hospital Staff: A. Guillstra	Fact
32	Children's Hospital Staff: S. Weinert	Fact
33	Children's Hospital Staff: C. Buguet, CRT	Fact
34	University Hospital Staff: Dr. Kathleen C. Hubbell	Fact
35	University Hospital Staff: Dr. Al Woeckener	Fact
36	University Hospital Staff: Dr. Aditya Nadimpalli	Fact
37	University Hospital Staff: Dr. Sanjay Patel	Fact
38	University Hospital Staff: Dr. Jose Restrepo-Gonzalez	Fact
39	University Hospital Staff: Dr. Carlos Gimenez	Fact
40	University Hospital Staff: Dr. Lisa Wong	Fact
41	Quest Diagnostics Staff: John G. Buck, M.D.	Fact

42		Gulf Coast Physician: Dr. Brobson Lutz	Fact
	Gulf Stream Coach, Inc.		
43		James "Jim" Shea Gulf Stream Coach, Inc., Chairman; President of Fairmont Homes	Fact
44		Dan Shea Gulf Stream Coach, Inc., Co-President In-charge of Towables Division	Fact
45		Brian Shea Gulf Stream Coach, Inc., Co-President In-charge of Motorized Division	Fact
46		Philip Sarvari Gulf Stream Coach, Inc., Executive Vice President	Fact
47		Eddie Abbott Gulf Stream Coach, Inc., Engineering Manager	Fact
48		Scott Pullin Gulf Stream Coach, Inc.	Fact
49		John Smith Gulf Stream Coach, Inc.; Co-President In-charge of Motorized Division	Fact
50		Burl Keel Gulf Stream Coach, Inc., Employee	Fact

51	Bill Leitch Gulf Stream Coach, Inc., Employee Service Department	Fact
52	Dale Schuler Gulf Stream Coach, Inc., Employee Service Department	Fact
53	Jeff Zumbrun Gulf Stream Coach, Inc., Employee Purchasing Manager	Fact
54	Rob Beck Gulf Stream Coach, Inc., Employee Purchasing Agent	Fact
55	Bob Reyes Gulf Stream Coach, Inc., Employee Plant Manager	Fact
56	John Bruhn Gulf Stream Coach, Inc., Employee Service Department	Fact
57	Lynda Esparza Gulf Stream Coach, Inc., Employee	Fact
58	Terry Sloan Gulf Stream Coach, Inc., Employee	Fact
59	Joseph Cleland Gulf Stream Coach, Inc., Employee	Fact
60	Mike Ward Gulf Stream Coach, Inc., Employee Customer Service, Towables	Fact

61	Todd J. Lentych Gulf Stream Coach, Inc., Employee Supplier Relations	Fact
62	Bill Dudeck Gulf Stream Coach, Inc., Employee Quality Control Manager	Fact
63	Rick Jones Gulf Stream Coach, Inc., Employee Director of Human Resources	Fact
64	Kevin Elliott Gulf Stream Coach, Inc., Employee Controller	Fact
65	Steven Lidy Gulf Stream Coach, Inc., Employee Director of Marketing	Fact
66	Michelle Hoover Gulf Stream Coach, Inc., Employee	Fact
67	Jose L. Luna Gulf Stream Coach, Inc., Employee	Fact
68	Owen Miller Gulf Stream Coach, Inc., Employee	Fact
69	Deborah Mullins Gulf Stream Coach, Inc., Employee	Fact
70	Cindy Rodriguez Gulf Stream Coach, Inc., Employee	Fact

71	Jim Kolar Gulf Stream Coach, Inc., Employee	Fact
72	Alan Pfiefer Gulf Stream Coach, Inc., Employee	Fact
73	Ronald Dheave Gulf Stream Coach, Inc., Employee	Fact
74	James Garcia Gulf Stream Coach, Inc., Employee	Fact
75	Tommy Yager Gulf Stream Coach, Inc., Employee	Fact
76	Patrick McCray Gulf Stream Coach, Inc., Employee	Fact
77	Luis Rolon Gulf Stream Coach, Inc., Employee	Fact
78	Alan Davis Gulf Stream Coach, Inc., Employee	Fact
79	Elizabeth Ganiere Gulf Stream Coach, Inc., Employee	Fact
80	Ramiro Ivarra Marin Gulf Stream Coach, Inc., Employee	Fact
81	Robert Golden Consultant to Gulf Stream Coach, Inc.	Fact
82	Tommy Gilbert Gulf Stream Coach, Inc. Employee	Fact

83		Michelle Vancampin Gulf Stream Coach, Inc. Employee	Fact
84		Kyle Timmins Current Gulf Stream Coach, Inc.	Fact
85		James Brown Current Gulf Stream Coach, Inc.	Fact
86		Jeremy Williams Current Gulf Stream Coach, Inc.	Fact
87		Jose Alvardo Gulf Stream Coach, Inc. Former (or current) Employee	Fact
88		Frank Jacquez Former Employee of Gulf Stream Coach, Inc.	Fact
89		Rodney Pratt Gulf Stream Coach, Inc. Quality Control Manager	Fact
90		Kenny Baker Former Employee of Gulf Stream Coach, Inc.	Fact
91		Mike Urbanski Former Employee of Gulf Stream Coach, Inc.	Fact
	Fluor Enterprises, Inc.		
92		Representative of Fluor Enterprises, Inc.	Fact
93		David Morvantano Fluor Enterprises, Inc. Senior Vice President; Government Affairs	Fact
94		Richard Hall Fluor Enterprises, Inc. Engineer	Fact

95	Heath Allen Fluor Enterprises, Inc./FEMA, Subcontractor; Installation of trailers	Fact
96	Travis Allen Fluor Enterprises, Inc./FEMA, Subcontractor; Installation of trailers	Fact
97	Robert Funkhouser Fluor Enterprises, Inc.	Fact
98	Hugo Linares Fluor Enterprises, Inc. Project Service Manager	Fact
99	Greg Meyer Fluor Enterprises, Inc.	Fact
100	James Cartnel Fluor Enterprises, Inc. Vice President; Operations	Fact
101	Al Whitaker Fluor Enterprises, Inc. Program Manager	Fact
102	Dwight Durham Fluor Enterprises, Inc. Program Director	Fact
103	Don Stokely Fluor Enterprises, Inc. Structural Engineer	Fact
104	Gerald P. Blanchard Subcontractor for Fluor Enterprises, Inc. Hauled and Installed Trailers	Fact
105	Lloyd Harris Fluor Enterprises, Inc. President/CEO	Fact

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106	Steve Doubleday Fluor Enterprises, Inc.	Fact
107	Grace Belcher Fluor Enterprises, Inc.	Fact
108	Dave Methot Fluor Enterprises, Inc. COTR Compliance	Fact
109	Mike Criss Fluor Enterprises, Inc. COTR Compliance	Fact
110	Lowell Wiles Fluor Enterprises, Inc. Field Operations Manager	Fact
111	Dave Hedges Fluor Enterprises, Inc. Construction Manager	Fact
112	Tom Perronne Fluor Enterprises, Inc. QC	Fact
113	Chris Supan Fluor Enterprises, Inc. Procurement	Fact
114	Teresa Morgan Fluor Enterprises, Inc. DDM/Proliance	Fact
115	Jay Moylan Fluor Enterprises, Inc. District Manager - Orleans/St. Bernard	Fact
116	Norman McCollum Fluor Enterprises, Inc. Logistics	Fact
117	Russell Blasamo Fluor Enterprises, Inc. Training	Fact

131	Chief Bronson Brown FEMA Occupational Health and Safety	Fact
132	David Chawaga FEMA Head of Safety in Washington, D.C.; 1A at Occupational Safety and Health	Fact
133	Eddie Kendrick FEMA Activity Supervisor/Contact for FEMA's Job Hazard Analysis for trailer in-bound inspections	Fact
134	Person(s) who performed and supervised the "FEMA Job Hazard Analysis" in July 2006	Fact
135	Patrick "Rick" E. Preston FEMA Trial Attorney, Office of General Counsel	Fact
136	Mary Ellen Martinet FEMA Attorney	Fact
137	Stephen Miller FEMA	Fact
138	Kevin Souza FEMA Administrative Program Management Branch Chief	Fact
139	Wayne Stoeh FEMA	Fact
140	David Garrett FEMA	Fact
141	Michael Lapinski FEMA	Fact

142	David Porter FEMA	Fact
143	Martin McNeese FEMA	Fact
144	Carol Wood FEMA	Fact
145	Chandra Lewis FEMA	Fact
146	Gary Moore FEMA/DHS Director of Logistics	Fact
147	Betsy Hall FEMA Gulf Coast Recovery	Fact
148	Chairman Ross FEMA	Fact
149	Jordan Fried FEMA	Fact
150	Don Jackson FEMA Material Coordinator	Fact
151	Melinda Razzano FEMA Inspector, Gulf Stream Plant 57	Fact
152	Darline Earl FEMA Inspector, Gulf Stream Plant 57	Fact
153	Joseph Matthews Office of Emergency Preparedness Director	Fact
154	Jill Igert Office of General Counsel	Fact
155	Guy Bonomo FEMA Direct Housing Operations Chief	Fact

156	Representative of Centers for Disease Control and Prevention (CDC)	Fact
157	Joseph Little CDC; ATSDR	Fact
158	Representative of ATSDR	Fact
159	Phillip M. Allred Agency for Toxic Substances and Disease Registry (ATSDR)	Fact
160	Sharon Wilbur, M.A. ATSDR Division of Toxicology	Fact
161	Thomas Sinks ATSDR	Fact
162	Howard Frumkin ATSDR	Fact
163	Donald Benken ATSDR	Fact
164	Scott Wright ATSDR	Fact
165	Representative of Environmental Protection Agency (EPA)	Fact
166	Sam Coleman EPA	Fact
167	Chairman Henry A. Waxman, D-California House Oversight and Government Reform Committee, Ranking Minority Member	Fact
168	Representative Gordon Tennessee Chairman of the House Committee on Science and Technology	Fact

179		Lynn Gibson Friend of Plaintiff Donna Gibson's daughter	Fact
180		Sister Liz Plaintiff Christopher Cooper's Former Principal	Fact
181		Christopher Cooper's Former 2 <sup>nd</sup> Grade Teacher	Fact
	Occupants of Units:		
182		Wade Breaux Complained of Gulf Stream Unit	Fact
183		Paul Stewart Complained of Unit Appeared in Local News Story	Fact
184		Darlene Moore Complained of Unit	Fact
185		Briggitte Roland Complained of Gulf Stream Unit	Fact
186		Wayne Benjamin Complained of Gulf Stream Unit	Fact
187		Claudia Williams Complained of Gulf Stream Unit	Fact
188		William Lecke Complained of Gulf Stream Unit	Fact
189		Randy LeBouef Complained of Gulf Stream Unit	Fact
190		Mike Resor Complained of Gulf Stream Unit Slidell Resident	Fact
	Vendors/ Suppliers:		

191	David Weed Robert Weed Plywood Corporation Supplier of Panels	Fact
192	David Smith Alpha Systems President	Fact
193	Pat White Domestic Corporation Vice President of Sales	Fact
194	Candie Bartley Tent's Decorator Industries Business Manager	Fact
195	Rick Newman Mishawaka Sheet Metal President	Fact
196	Bill Clindaniel Interior Accessories President	Fact
197	Dr. Don Weldy Aluminum Metals Company	Fact
198	Ron Wenger Dehco, Inc. Executive Vice President	Fact
199	Don Wise JEJ General Manager	Fact
200	Steve Huffman ESCO Vinyl and Ceiling Board Supplier	Fact
201	Kelly Rentfrow ESCO Vinyl and Ceiling Board Supplier	Fact
202	Rob W. Genesis Products, Inc.	Fact

203	Roger E. Schroeder Robert Weed Plywood Corporation Salesman	Fact
204	Andy Lertola Patrick Industries National Account Manager	Fact
205	Dean Sippel Patrick Industries Director	Fact
206	John Boynton LaSalle Bristol First Line	Fact
207	Chris Clementz Adorn Supplier	Fact
208	Dan West Adorn Wood Bridge, First Line Supplier	Fact
209	Bill Schmatz Weyerhaeuser	Fact
210	Kim Hershberger Weyerhaeuser	Fact
211	Thomas Teach Century Foam President	Fact
212	William N. Watters Syntec Industries President	Fact
213	Julie Sylvester Genesis Products, Inc. Sales	Fact
214	Jeff Messick MJB Wood Group, Inc.	Fact
215	Dennis Gentry BlueLinx Corporation	Fact

216	Jennifer Beck BlueLinx Corporation Sales Service Coordinator	Fact
217	Michael Dawson Norbord Industries General Manager	Fact
218	Ann C. Benjamin Sampling USA, LLC Office Manager	Fact
219	Sandra Shoup Sampling USA, LLC	Fact
220	Brian Pierce Woodgrain Millwork, Inc.	Fact
221	Corey Field Woodgrain Millwork, Inc. Indiana Sales	Fact
222	Paul Wagner Bornemann Products, Inc. President	Fact
223	Charlie H. Compton Hambro Forest Products, Inc.	Fact
224	Dwayne Reichlin Hambro Forest Products, Inc.	Fact
225	Robert Matthews Hambro Forest Products, Inc. Vice President	Fact
226	Linda Sinon BlueLinx Corporation	Fact
227	Pam Perkins BlueLinx Corporation	Fact
228	Dan Goodman Hambro Forest Products	Fact
229	Bob Merriweather Hambro Forest Products Transporation Dispatcher	Fact

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230		Sue Wilson Hambro Forest Products Accounts Receivable and Sales	Fact
231		Amy Lotz JEJ Molding	Fact
232		Amy Burnside Owen Corning Area Sales Manager	Fact
233		David Chubb Former Gulf Stream Coach, Inc. Vendor	Fact
234		Scott Bailey Employee of Patrick Industries/Adorn LLC	Fact
	Other:		
235		Representative of Bureau Veritas	Fact
236		Representative of Weston Solutions	Fact
237		Representatives of the California Air Resources Board (CARB)	Fact
238		Representative of Adorn, LLC and/or Patrick Industries	Fact
239		Raoult Ratard, M.D. Louisiana State Epidemiologist Infectious Disease and Epidemiology	Fact
240		Jesse Fineran Former Hancock County Emergency Operations Center Hazardous Materials Specialist	Fact
241		Becky Gillette Sierra Club, Formaldehyde Campaign Director	Fact

242	Dr. Merrill Karol Professor Emeritus, University of Pittsburgh	Fact
243	Dr. Scott Needle Mississippi Pediatrician	Fact
244	Heidi Sinclair, M.D., M.P.H.	Fact
245	Michael S. Bonner, Ph.D. Bonner Analytical Testing Company	Fact/ Expert
246	Nathan R. Vallette W.D. Scott Group	Fact
247	Ronni Troiano W.D. Scott Group	Fact
248	Martha R. Cooley Subcontractor for FEMA Inspector; Former Employee of Fluor Contractors - Gill & Associates & Tri-County Contractor	Fact
249	Rachel M. Griffin Subcontractor for FEMA Inspector; Former Employee of Fluor Contractors - Gill & Associates & Tri-County Contractor	Fact
250	James E. Brewer Subcontractor for Fluor Enterprises, Inc. Inspector; F2S Construction Company	Fact
251	Teresa F. Dabbs Subcontractor for FEMA Inspector; Former Employee of Fluor Contractors - Gill & Associates & Tri-County Contractor	Fact

252	Custodian of Records and/or Representative for Assay Technology	Fact
253	Custodian of Records and/or Representative for ALS Canada, Inc.	Fact
254	Custodian of Records and/or Representative for Galson Laboratories	Fact
255	Custodian of Records and/or Representative for Advanced Chemical Sensors	Fact
256	Charles Albert Gibson Former Employee of FEMA	Fact
257	Darren Lemieux Subcontractor for FEMA or Fluor Enterprises, Inc.	Fact
258	Darryl Lemieux Subcontractor for FEMA or Fluor Enterprises, Inc.	Fact
259	Dan Lemieux Subcontractor for FEMA or Fluor Enterprises, Inc.	Fact
260	Charles Parent New Orleans Fire Department Superintendent	Fact
261	Bruce Martin New Orleans Fire Department Deputy	Fact
262	Ebert Thomas Chief of Fire Prevention	Fact
263	Jesse Crowley Chief of Staff, JFO Biloxi, MS	Fact

264	Kent Smith Contractor for FEMA President, Del-Jen, Inc.	Fact
265	Phil Bouwkamp	Fact
266	Michael S. LaRoy Pittsburgh Testing Lab Senior Laboratory Technician	Fact
267	Randy T. Webb Pittsburgh Testing Lab Division Manager	Fact
268	Yavonda Smalls South Bend Tribune Reporter	Fact
269	Sidney Melton	Fact
270	Philip Mason EOC Operations	Fact
271	Gregory S. Blair NETC Acquisition Selection Contract Specialist	Fact
272	Leah Rose Formaldehyde Council Program Coordinator	Fact
273	Rich Rigby Maintenance Coordinator	Fact
274	Andrew Boyce EHS Coordinator	Fact
275	Dennis Kizziah	Fact
276	H. Robert Weiss MAIC Contracts Manager	Fact
277	Barbara Vining Vista View Ridge President	Fact
278	Donald Pierce Lawyer for Mike Resor	Fact

279	Chuck Barkus Henkel Adhesives	Fact	
280	Todd Cleveland Adorn President	Fact	
281	Charlene Rose	Fact	
282	Ashley Rose	Fact	
283	Kevin McCarthy COTR for Fluor Enterprises in LA	Fact	
284	Any and all other witnesses which may be identified or discovered on the basis of Defendants' responses to discovery propounded by Plaintiffs or depositions taken during discovery in this matter	Fact	

Plaintiffs reserve the right to call any and all Plaintiffs and Defendants (or their employees, agents, and/or representatives) in the FEMA Trailer Formaldehyde Product Liability Litigation. Plaintiffs also reserve the right to call any witness who becomes known during discovery of this matter. Plaintiffs further reserve the right to supplement and amend this list once discovery is complete.

Respectfully submitted:

# FORMALDEHYDE TRAILER FORMALDEHYDE PRODUCT LIABILITY LITIGATION

BY: s/Gerald E. Meunier

GERALD E. MEUNIER, #9471

#### PLAINTIFFS' CO-LIAISON COUNSEL

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s/Justin I. Woods

**IUSTIN I. WOODS, #24713** 

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jwoods@gainsben.com

## **COURT-APPOINTED PLAINTIFFS' STEERING COMMITTEE**

ANTHONY BUZBEE, Texas # 24001820 RAUL BENCOMO, #2932 FRANK D'AMICO, #17519 MATT MORELAND, #24567 LINDA NELSON, #9938 MIKAL WATTS, Texas # 20981820 DENNIS REICH, Texas # 16739600 ROBERT BECNEL, #14072

#### **CERTIFICATE OF SERVICE**

I hereby certify that on \_\_\_\_\_\_, 2009, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic

filing to all counsel of record who are CM/ECF participants. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to all counsel of record who are non-CM/ECF participants.

s/Gerald E. Meunier GERALD E. MEUNIER, #9471