UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA **NEW ORLEANS DIVISION**

IN RE: FEMA TRAILER MDL NO. 1873

FORMALDEHYDE

PRODUCT LIABILITY LITIGATION **SECTION "N-5"**

> JUDGE ENGELHARDT MAG. JUDGE CHASEZ

THIS DOCUMENT IS RELATED TO:

Lyndon Wright v. Forest River, Inc., et al. Case No. 09-2977 (E.D. La.)

PLAINTIFF'S WITNESS LIST

NOW INTO COURT, through undersigned counsel, comes Plaintiff, Lyndon Wright, pursuant to this Honorable Court's August 2009 Trial Scheduling Order, who hereby submits the following Witness List in connection with the above-captioned matter, which will be supplemented based upon ongoing discovery as needed:

	Category:	Witness:	Type of Witness:	May / Will Call:
	Plaintiffs:			
1.		Lyndon Wright	Fact	
	Specific to Wright:			
2.		Bobbi Wright	Fact	
3.		Robert Fink	Fact	
4.		Tyshawn Marsh	Fact	
5.		Dr. Field	Fact	
6.		Dr. Frank Cruz	Fact	

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7.		Any and all other doctors at Uptown Nephrology who have treated and/or have knowledge of Lyndon Wright	Fact
8.		Gina Manguno-Mire, Ph.D.	Fact
9.		Albert Jarrell	Fact
10.		Robert Fink	Fact
11.		Nicole Dyson	Fact
12.		Tomika Zachary	Fact
13.		Any and all witnesses who may be identified or discovered during the ongoing litigation	
	Experts:		
14.		Dr. Lee Branscombe, Ph.D., C.C.M.	Expert
15.		Dr. Paul Hewett, Ph.D.	Expert
16.		Dr. Kenneth Laughery, Ph.D.	Expert
17.		Alexis Mallet, Jr.	Expert
18.		Dr. Lawrence Miller, M.D.,M.P.H.	Expert
19.		Charles David Moore, P.E., P.L.S.	Expert
20.		Ervin Ritter, P.E.	Expert
21.		William Scott, P.E., C.H.M.M.	Expert
22.		Dr. Edward Shwery, Ph.D.	Expert
23.		Dr. Stephen Smulski, Ph.D.	Expert
24.		Dr. Patricia Williams, Ph.D.	Expert
25.		Paul LaGrange	Expert
26.		Dr. Richard A. Spector	Expert
27.		Custodian of Records for Dr. George A. Farber	Expert

28.		Any and all witnesses who may be identified or discovered during the ongoing litigation	Fact/Expert
	U.S.A.		
29.		Robert James, Ph.D.	Expert
30.		Bruce Kelman, Ph.D.	Expert
31.		Michael Lindell, Ph.D.	Expert
32.		Richard Monson, M.D., Sc.D.	Expert
33.		Mark Polk	Expert
34.		Coreen Robbins, M.H.S., Ph.D., C.I.H.	Expert
35.		Dr. Christopher DeRosa	Fact /
		Center for Disease Control and Prevention (CDC)	Expert
36.		Representative of the Federal Emergency Management Agency (FEMA)	Fact
37.		Bryan McCreary FEMA Contracting Officer	Fact
38.		Chief R. David Paulison FEMA Administrator	Fact
39.		Admiral Harvey Johnson FEMA	Fact
40.		Chief Bronson Brown FEMA Occupational Health and Safety	Fact
41.		David Chawaga FEMA Head of Safety in Washington, D.C.; 1A at Occupational Safety and Health	Fact
42.		Eddie Kendrick FEMA Activity Supervisor/Contact for FEMA's Job Hazard Analysis for trailer in-bound inspections	Fact
43.		Person(s) who performed and supervised the "FEMA Job Hazard Analysis" in July 2006	Fact
44.		Patrick "Rick" E. Preston FEMA Trial Attorney, Office of General Counsel	Fact
45.		Mary Ellen Martinet FEMA Attorney	Fact

46.	Stephen Miller	Fact
	FEMA	
47.	Kevin Souza	Fact
	FEMA Administrative Program	
	Management Branch Chief	
48.	Wayne Stoeh	Fact
	FEMA	
49.	David Garrett	Fact
	FEMA	
50.	Michael Lapinski	Fact
<u></u>	FEMA	Т.
51.	David Porter	Fact
	FEMA	
52.	Martin McNeese	Fact
	FEMA	<u> </u>
53.	Carol Wood	Fact
	FEMA	
54.	Chandra Lewis	Fact
	FEMA	<u> </u>
55.	Gary Moore	Fact
	FEMA/DHS, Director of Logistics	
56.	Betsy Hall	Fact
55	FEMA, Gulf Coast Recovery	77
57.	Chairman Ross	Fact
5 0	FEMA	7
58.	Jordan Fried	Fact
50	FEMA	77
59.	Don Jackson	Fact
60	FEMA, Material Coordinator	Т.
60.	FEMA Inspector for Forest River, Inc.	Fact
<i>C</i> 1	Plant, yet to be designated	T
61.	Joseph Matthews	Fact
	Office of Emergency Preparedness	
(2)	Director	E4
62.	Jill Igert	Fact
(2)	Office of General Counsel	East
63.	Guy Bonomo	Fact
64	FEMA, Direct Housing Operations Chief	East
64.	Representative of Centers for Disease	Fact
(5	Control and Prevention (CDC)	T4
65.	Joseph Little, CDC; ATSDR	Fact
66.	Representative of ATSDR	Fact
67.	Philip M. Allred	Fact
	Agency for Toxic Substances and Disease	
	Registry (ATSDR)	

68.		Sharon Wilbur, M.A. ATSDR, Division of Toxicology	Fact
69.		Thomas Sinks ATSDR	Fact
70.		Howard Frumkin ATSDR	Fact
71.		Donald Benken ATSDR	Fact
72.		Scott Wright ATSDR	Fact
73.		Representative of Environmental Protection Agency (EPA)	Fact
74.		Sam Coleman EPA	Fact
75.		Chairman Henry A. Waxman, D-California House Oversight and Government Reform Committee, Ranking Minority Member	Fact
76.		Representative Gordon Tennessee Chairman of the House Committee on Science and Technology	Fact
77.		Steven Larsen FEMA	Fact
78.		Michael Harder FEMA	Fact
79.		Any and all witnesses who may be identified or discovered on the basis of Defendant's responses to discovery propounded by Plaintiff or depositions taken during discovery in this matter	Fact/Expert
	Forest River, Inc.		
80.		Elton Kiefer	Fact
81.		Jeff Burrian	Fact
82.		Norman Nelson	Expert
83.		G. Graham Allan	Expert
84.		Philip Cole, M.D.	Expert
85.		Nathan T. Dorris	Expert
86.		William L. Dyson	Expert

87.		Thomas Fribley	Expert
88.		Don Snell	Expert
89.		Kenneth B. Smith	Expert
90.		Dr. John W. Thompson	Expert
91.		Tony Watson	Expert
92.		H. James Wedner, M. D.	Expert
93.		Jaime Albrecht	Fact
94.		Jim Foltz	Fact
95.		Forest River Warranty Officer, yet to be designated	Fact
96.		Corporate Representative of Forest River, Doug Gaeddert	Fact
97.		Corporate Representative of Forest River, yet to be designated	Fact
98.		Any and all witnesses who may be identified or discovered on the basis of Defendant's responses to discovery propounded by Plaintiff or depositions taken during discovery in this matter	Fact/Expert
	Shaw Environmental:		
99.		John D. Osteraas	Expert
101		Corporate Representative of Shaw Environmental	Fact
102		Project Manager of Shaw Environmental	Fact
103		Any and all witnesses who may be identified or discovered on the basis of Defendant's responses to discovery propounded by Plaintiff or depositions taken during discovery in this matter	Fact/Expert
	Vendors/Suppliers		
104		Any and all witnesses who may be identified or discovered on the basis of Defendants' responses to discovery propounded by Plaintiff or depositions taken during discovery in this matter	Fact/Expert

	Other:		
105		Corporate Representative of Lippert	Fact
		Components	
106		Corporate Representative of RCG	Fact
		Enterprises	
107		Representative of NACS	Fact
108		Representative of RVIA	Fact
109		Formaldehyde Counsel	Fact
110		Any and all witnesses who may be	Fact/Expert
		identified or discovered on the basis of	
		Defendants' responses to discovery	
		propounded by Plaintiff or depositions	
		taken during discovery in this matter	
111		Any and all witnesses listed by any other	Fact/Expert
		party in this action	

Plaintiff respectfully reserves the right to utilize any exhibit listed by any other party or utilized as an exhibit in the depositions taken in this matter. Plaintiff further respectfully reserves the right to supplement and amend this list once discovery is complete.

RESPECTFULLY SUBMITTED:

FRANK J. D'AMICO, JR., APLC

BY: s/Frank J. D'Amico, Jr.
FRANK J. D'AMICO, JR., T.A. (#17519)
AARON Z. AHLQUIST (#29063)
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New Orleans, LA 70113

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CERTIFICATE OF SERVICE

I hereby certify that on November 30, 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/Frank J. D'Amico FRANK J. D'AMICO, #17519