

*file in record*

U. S. DISTRICT COURT EASTERN DISTRICT OF LOUISIANA	
SEP 24 2009	
LORETTA G. WHYTE CLERK	

IN THE 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 RELATES TO:  
*CHARLIE AGE, ET AL V. GULF STREAM  
COACH INC., ET AL., NO. 09-2892*

.....  
JOINT STIPULATIONS OF FACTS

THE PARTIES HAVE AGREED, OR STIPULATED TO THE FOLLOWING:

1. FEMA HAS PROVIDED THOUSANDS OF TRAVEL TRAILERS TO DISPLACED RESIDENTS FOLLOWING NATURAL DISASTERS IN THE UNITED STATES SINCE 1992, INCLUDING DISPLACED RESIDENTS FROM THE GULF COAST REGION.
2. FEMA PROVIDED APPROXIMATELY 143,000 EMERGENCY HOUSING UNITS TO FAMILIES ACROSS THE GULF COAST, IN RESPONSE TO HURRICANES KATRINA AND RITA.
3. FEMA PROVIDED PLAINTIFF ALANA ALEXANDER AND HER MINOR SON A TRAVEL TRAILER WITH VEHICLE IDENTIFICATION NUMBER (VIN) 1N61GTR2551021783.
4. THIS TRAVEL TRAILER WAS MANUFACTURED BY DEFENDANT GULF STREAM COACH, INC. ON OR ABOUT DECEMBER 13, 2004.
5. GULF STREAM COACH, INC. SOLD THE TRAVEL TRAILER TO BEST BUY RV ON OR ABOUT DECEMBER 13, 2004.

*M*

6. GULF STREAM TRAVEL TRAILERS IN 2004 WERE MADE WITH COMPOSITE WOOD PRODUCTS, SUCH AS PLYWOOD, PARTICLE BOARD AND FIBERBOARD, THAT CONTAINED FORMALDEHYDE.

7. FLUOR HAD A CONTRACT WITH THE GOVERNMENT TO INSTALL TRAVEL TRAILERS AFTER HURRICANES KATRINA AND RITA, INCLUDING THE TRAVEL TRAILER OCCUPIED BY MS. ALEXANDER AND HER FAMILY.

8. IN FEBRUARY 2006, THE GULF STREAM TRAILER WAS SET UP AT 4415 DALE STREET BY A SUBCONTRACTOR OF ONE OF FLUOR'S SUBCONTRACTORS. MS. ALEXANDER AND HER FAMILY MOVED INTO THE TRAILER ON MAY 26, 2006.

9. ON JANUARY 2829, 2008, THE GULF STREAM TRAILER, WHICH HAD BEEN OCCUPIED BY ALANA ALEXANDER AND HER FAMILY, WAS TESTED FOR FORMALDEHYDE. THE AVERAGE TEMPERATURE INSIDE THE TRAVEL TRAILER AT THIS TIME WAS 71.8 DEGREES FAHRENHEIT, THE AVERAGE INDOOR HUMIDITY WAS 47%, AND THE LEVEL OF FORMALDEHYDE WAS 0.050 PPM.

10. GULF STREAM PROVIDED NO WRITTEN OR ORAL WARNINGS DIRECTLY TO ALANA ALEXANDER OR HER FAMILY REGARDING THE SUBJECT OF FORMALDEHYDE IN THE TRAVEL TRAILER, WHICH THEY OCCUPIED.

11. CHRIS COOPER WAS DIAGNOSED WITH ASTHMA AT AGE 3 IN 1999.

12. ALANA ALEXANDER HAS NEVER SEEN A DOCTOR FOR

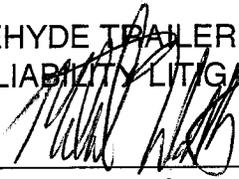
FORMALDEHYDE RELATED INJURIES.

13. ERIKA ALEXANDER IS A NAMED PLAINTIFF IN THIS LITIGATION. THE COURT HAS DETERMINED THAT ALANA ALEXANDER'S AND CHRISTOPHER COOPER'S CASE SHALL BE TRIED SEPARATELY FROM ERIKA'S CASE.

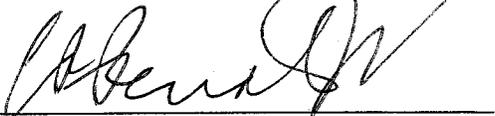
14. PAUL BLANCHARD (KNOWN AS "GATOR") WAS EMPLOYED BY KEDO PROPERTIES, L.L.C., IN CONNECTION WITH INSTALLING TRAILERS FOLLOWING HURRICANE KATRINA.

RESPECTFULLY SUBMITTED:

FORMALDEHYDE TRAILER FORMORMALDEHYDE  
PRODUCT LIABILITY LITIGATION

BY:   
MIKAL C. WATTS

BY:   
ANDREW WEINSTOCK  
COUNSEL FOR GULFSTREAM

BY:   
CHARLIE PENOT  
COUNSEL FOR FLUOR