

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
NEW ORLEANS DIVISION

IN RE: FEMA TRAILER
FORMALDEHYDE
PRODUCT LIABILITY LITIGATION

MDL NO. 1873

SECTION "N-5"
JUDGE ENGELHARDT
MAG. JUDGE CHASEZ

THIS DOCUMENT IS RELATED TO:

*Alana Alexander and Chris Cooper v.
Gulf Stream Coach, Inc., et. al.*

WILL CALL WITNESS LIST

The United States designates the following individuals to its Will Call Witness List:

United States of America's Will Call Fed. Civ. P. 26(a)(2)(B) Experts:

1. Dr. Jessica Herzstein, M.D., M.P.H.
Global Medical Director
Air Products and Chemicals
7201 Hamilton Boulevard
Allentown, PA 18195-1501

Environmental Health Resources, P.C.
1755 P Street, NW
Washington, D.C. 20036
2. Dr. Robert James, Ph.D.
Terra, Inc.
1234 Timberlane Road
Tallahassee, FL 32312

Associate Scientist
Center for Environment and Human Toxicology
Building 471, Mallory Road
University of Florida
Gainesville, FL 326111-0885
3. Dr. Michael K. Lindell, Ph.D.

3122 Camelot Drive #52
Bryan, Texas 77802

4. Dr. Richard Monson, M.D., M.Sc., Sc.D.
Boston, MA
5. Mark J. Polk
RV Education 101
150 Bay Ridge Road
Harrells, NC 28444
6. Coreen A. Robbins, Ph.D., CIH
Veritox
18372 Redmond-Fall City Road
Redmond, WA 98052
Redmond, Wa

United States Will Call Witnesses:

1. Bronson Brown
Section Chief of Occupation Safety, Health & Security Branch
Facilities Management Division
FEMA DHS
2. David Garratt
Acting Deputy Administrator
FEMA DHS
3. Jack Hume,
Bechtel Rule 30(b)(6)
San Francisco, CA
4. Dr. William Lang, M.D.
Assoc. Chief of Medical Office
US Dept. of Homeland Security Health

As part of its response actions to formaldehyde concerns, FEMA commencing on or about May 2007 consulted with Dr. Lang. The United States hereby notifies the parties that the advice he provided may potentially be considered Fed. R. Evid. 702, 703 or 705.

5. Mike Lapinski
Federal Coordinating Officer
Office Coordinating Officer Operations
FEMA DHS
6. Martin McNeese
Assistant Branch Chief Region 8
FEMA DHS
7. Kenneth J. Melchiorre (deposition)
CH2M Hill, Inc.
Virginia
8. Stephen C. Miller
Logistics Management Specialist Supervisor
FEMA DHS
9. Clyde Payne
Officer In Charge
Jackson Area Office
Occupation Safety and Health Agency
U.S. Department of Labor
Jackson, Mississippi
10. Kevin Souza
Chief
Individual Assistance Program Management (2005-2008)
Individual Assistance Division
FEMA DHS

United States of America May Call Witness List:

1. Gulf Stream Coach, Inc., Rule 26 Expert Witnesses.
2. Fluor Enterprises, Inc., Rule 26 Expert Witnesses.
3. Plaintiffs' Rule 26 Expert Witnesses.

4. P. Michael Allred, Ph.D.
Deputy Director
Office of Terrorism, Preparedness and
Emergency Response
National Center for Environmental Health/
Agency for Toxic Substances and Disease Registry

As part of its response actions to formaldehyde concerns, FEMA commencing on or about June 2006 consulted with the CDC/ATSDR. The United States hereby notifies the parties that the advice Dr. Allred provided may potentially be considered evidence under Fed. R. Evid. 702, 703 or 705. *See* CDC/ATSDR February 1, 2007, Health Consultation.

5. Jesse Barnes
Jackson Area Office
Occupation Safety and Health Agency
U.S. Department of Labor
Jackson, Mississippi
6. Bob Bennett
Chief of Staff
Texas TRO
FEMA DHS
7. Michael S. Bonner
Bonner Analytical Testing Company
2703 Oak Grove Road
Hattiesburg, MS 39402
Phone: 601.264.2854
8. Lenell Bryant
DHOPS Special Projects/
DHOPS Demolition Lead
FEMA DHS
9. Ryan Buras
Program Specialist
DAD-IA-PM-ES-HS
FEMA DHS

10. David Chawaga
Safety Specialist
OM-FM-SY-SH
FEMA DHS

11. Sam Coleman
Director
Enforcement Division, Region VI
U.S. Environmental Protection Agency

As part of its response actions to formaldehyde concerns, FEMA commencing on or about June 2006 consulted with the Environmental Protection Agency. The United States hereby notifies the parties that the advice Mr. Coleman provided may potentially be considered evidence under Fed. R. Evid. 702, 703 or 705. *See* CDC/ATSDR February 1, 2007, Health Consultation.

12. Ronnie Crossland
Enforcement Division, Region VI
U.S. Environmental Protection Agency

As part of its response actions to formaldehyde concerns, FEMA commencing on or about June 2006 consulted with the Environmental Protection Agency. The United States hereby notifies the parties that the advice Mr. Crossland provided may potentially be considered evidence under Fed. R. Evid. 702, 703 or 705. *See* CDC/ATSDR February 1, 2007, Health Consultation.

13. Robert Ferguson
MHOPS Maintenance
FEMA DHS

14. Eric Gentry
Team Leader R-5 First
FEMA DHS

15. Carl Hallstead
Lead Program Specialist
DAD-IA-PM-HS
FEMA DHS

16. Mike Harder
Recertification Advisor
TRO-LA-RE
FEMA DHS

17. Gail Haubrich
Individual Assistance Housing Supervisor
FEMA DHS
 18. Tracy Haynes
Branch Chief
IM-RS
FEMA DHS
 19. Cindy Howell
FEMA DHS
 20. Robert Ives
Director
Alabama Transitional Recovery Office
FEMA DHS
 21. Gil Jamieson
Associate Deputy Administrator
Gulf Coast Recovery
FEMA DHS
(former FEMA employee)
 22. Burl Keel
Gulf Stream Coach, Inc.
(By deposition if he does not appear at trial)
 23. Mark E. Keim, M.D.
Acting Associate Director
Office of Terrorism, Preparedness and
Emergency Response
National Center for Environmental Health/
Agency for Toxic Substances and Disease Registry
- As part of its response actions to formaldehyde concerns, FEMA commencing on or about June 2006 consulted with CDC/ATSDR. The United States hereby notifies the parties that the advice Dr. Keim provided may potentially be considered Fed. R. Evid. 702, 703 or 705. *See* CDC/ATSDR February 1, 2007, Health Consultation.
24. Deidre Lee
Director OM
FEMA DHS

25. Joseph D. Little, Cmdr.
Emergency Coordinator
National Institute for Occupational Safety and Health
Centers for Disease Control and Prevention
Atlanta, GA

As part of its response actions to formaldehyde concerns, FEMA commencing on or about June 2006 consulted with Commander Little, Public Health Service. The United States hereby notifies the parties that the advice he provided may potentially be considered Fed. R. Evid. 702, 703 or 705. *See* CDC/ATSDR February 1, 2007, Health Consultation.

26. Bryan McCreary
Supervisor Contract Specialist
OM-AQ-CP-MT-NA
FEMA DHS
27. Blair McDonald,
Gulf Coast Recovery Office
FEMA DHS
28. Michelle McQueeney
Chief of Staff
Gulf Coast Recovery Office
FEMA DHS
(former FEMA employee)
29. Sidney Melton
Individual Assistance Section Chief
TRO MS/LA
FEMA DHS
30. Michael Miller
Emergency Housing Unit, Area Field Office Coordinator
FEMA DHS
31. Mark Misczak
Branch Chief
DAD-IA-PM-HS
FEMA DHS

32. Jenny Mooney
Contract Technical Representative
General Services Administration
Atlanta, GA
33. Clifford Oliver
Special Programs Program Manager
Acquisition Program and Planning Branch
Office of Acquisition Management
FEMA DHS
34. David Porter
ITESS COTR
DHS-OCIO
IT Acquisition Mgmt Branch
U.S. Dept. of Homeland Security
(former FEMA employee)
35. Scott Pullin
Gulf Stream Coach, Inc.
(By deposition if he does not appear at trial)
36. Jon Rauscher
Enforcement Division, Region VI
U.S. Environmental Protection Agency

As part of its response actions to formaldehyde concerns, FEMA commencing on or about June 2006 consulted with the Environmental Protection Agency. The United States hereby notifies the parties that the advice Mr. Coleman provided may potentially be considered evidence under Fed. R. Evid. 702, 703 or 705. *See* CDC/ATSDR February 1, 2007, Health Consultation.

37. Eugene Romano
FEMA DHS
38. Dr. Jeff Rung, M.D.
Assistant Secretary Health Affairs
U.S. Dept. of Homeland Security

As part of its response actions to formaldehyde concerns, FEMA commencing on or about May 2007 consulted with Dr. Lang. The United States hereby notifies the parties that the advice he provided may potentially be considered Fed. R. Evid. 702, 703 or 705.

39. James N. Russo
Federal Coordinating Officer
RE-FC
FEMA DHS
40. Phil Savari
Gulf Stream Coach, Inc.
(By deposition if he does not appear at trial)
41. Charles Schexnaildre
Individual Assistance Group Supervisor
DR-LA-1603/1607 & DR-LA 1786/1792
LATRO
FEMA DHS
42. Richard C. Seeds
Disaster Assistance Employee
FEMA OHS
FEMA DHS
43. Kenneth Sessa
Environmental Officer
R7-IM-CM
FEMA DHS
44. Jim Shea
Gulf Stream Coach, Inc.
(By deposition if he does not appear at trial)
45. Dan Shea
Gulf Stream Coach, Inc.
(By deposition if he does not appear at trial)
46. Brian Shea
Gulf Stream Coach, Inc.
(By deposition if he does not appear at trial)
47. James W. Stark
Director
TRO-LA-OP
FEMA DHS

- 48. Wayne Stoeh
FEMA DHS
- 49. Stacy Stucholdolski
FEMA DHS
- 50. Dana Tulis
Deputy Director
Office of Emergency Mangement
U.S. Environmental Protection Agency

As part of its response actions to formaldehyde concerns, FEMA commencing on or about June 2006 consulted with the Environmental Protection Agency. The United States hereby notifies the parties that the advice Mr. Coleman provided may potentially be considered evidence under Fed. R. Evid. 702, 703 or 705. *See* CDC/ATSDR February 1, 2007, Health Consultation.

- 51. Tammi Wisko
Gulf Coast Recovery Office
FEMA DHS
- 52. Scott Wright
Emergency Response Coordinator
Center for Disease Control and Prevention/
Agency for Toxic Substances and Disease Registry

As part of its response actions to formaldehyde concerns, FEMA commencing on or about June 2006 consulted with the CDC/ATSDR. The United States hereby notifies the parties that the advice CDC/ATSDR provided may potentially be considered evidence under Fed. R. Evid. 702, 703 or 705. *See* CDC/ATSDR February 1, 2007, Health Consultation.

- 53. Faye Green
IA Division
FEMA DHS
- 54. FEMA Document Custodian from External Affairs.
- 55. FEMA Document Custodian from Individual Assistance.
- 56. FEMA Document Custodian from Logistics.
- 57. All persons designated by Plaintiffs' as will call/may call witness.

58. All persons deposed by any Defendant as will call/may call witness.
59. CDC Custodian of Records
60. EPA Custodian of Records
61. OSHA Custodian of Records
62. Erica Alexander
63. Shirley Alexander
64. Chris Cooper
65. Alana Alexander

Dated: July 1, 2009.

Respectfully Submitted,

TONY WEST
Assistant Attorney General, Civil Division

ADAM BAIN
HENRY T. MILLER
Senior Trial Counsel

J. PATRICK GLYNN
Director, Torts Branch, Civil Division

ADAM DINNELL
MICHELE GREIF
Trial Attorneys

DAVID S. FISHBACK
Assistant Director

//S// Jonathan Waldron
JONATHAN WALDRON (MO Bar 58898)
Trial Attorney
United States Department of Justice
Civil Division – Torts Branch
P.O. Box 340, Ben Franklin Station
Washington, D.C. 20004
Telephone No: (202) 307-2091
E-mail: Jonathan.Waldron@USDOJ.Gov

OF COUNSEL:
JORDAN FRIED
Associate Chief Counsel

JANICE WILLIAM-JONES
Trial Attorney
FEMA/DHS
Department of Homeland Security
Washington, D.C. 20472

Attorneys for the United States of America

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2009, this document was filed via the U.S. District Court's CM/ECF electronic filing system a copy thereof was served upon Liaison Counsel.

//S// Jonathan Waldron
JONATHAN WALDRON (MO Bar No. 58898)

