

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
NEW ORLEANS DIVISION

IN RE: FEMA TRAILER	*	MDL NO. 1873
FORMALDEHYDE	*	
PRODUCTS LIABILITY	*	
LITIGATION	*	SECTION: N(5)
	*	
This Document Relates to: <i>Lyndon T. Wright v.</i>	*	JUDGE: ENGELHARDT
<i>Forest River, Inc., et al</i> , Docket No. 09-2977	*	
	*	MAG: CHASEZ

JOINT STIPULATION

Plaintiff, Lyndon T. Wright, and defendants, Forest River, Inc. and Shaw Environmental, Inc., though their respective undersigned counsel, hereby jointly stipulate that the following Orders related to Motions in Limine filed in prior bellwether trials shall apply and be binding in the instant case.¹ A brief, though not exhaustive, description of those Orders has been provided for the convenience of the Court.

1. Rec. Doc. 3069 (regarding references to subsequently passed ambient air standards)
2. Rec. Doc. 3029 (regarding references to political proceedings)
3. Rec. Doc. 3018 (regarding inflammatory commentary of counsel, testimony and evidence related to plaintiff's Hurricane Katrina evacuation experience, and any reference or evidence related to income of Forest River)

¹ To be clear, Orders applicable to Gulf Stream and Fleetwood would be applicable to Forest River, those applicable to Fluor would be applicable to Shaw, and those applicable to prior plaintiffs would be applicable to Lyndon Wright.

4. Rec. Doc. 3067 (regarding the testimony of Chris DeRosa)
5. Rec. Doc. 7684 (regarding miscellaneous issues raised by Fleetwood)
6. Rec. Doc. 3019 (regarding references to Shaw's financial condition or money paid to Shaw, references to Shaw as a "no bid" contractor, and references to the Office of Inspector's report dated August 2008)
7. Rec. Doc. 8171 (regarding references to claims of other MDL litigants)
8. Rec. Doc. 8373 (regarding references to certain claims)
9. The parties stipulate that the Orders on following numbered items in Rec. Doc. 3030 will be binding on all parties and will apply across the board (*i.e.*, what is not permitted by one party will not be allowed by another) :
1, 2, 5-8, 10, 15-17, 19-21, 23, 24, 26, 27, 29, 31

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of February, 2010, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this file will be sent to all known counsel of record by operation of the court's electronic filing system.

/s/ Jason D. Bone