

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

**IN RE: FEMA TRAILER
FORMALDEHYDE
PRODUCT LIABILITY LITIGATION**

**MDL NO. 1873
SECTION "N-4"**

**JUDGE ENGELHARDT
MAG. JUDGE ROBY**

THIS DOCUMENT IS RELATED TO ALL CASES

**SECOND SUPPLEMENTAL AND
AMENDED MASTER COMPLAINT**

Plaintiffs through undersigned counsel respectfully supplement and amend their Original and First Supplemental and Amended Master Complaints herein, in the following respects:

1.

By deleting the name of Carol Eleanor Salassi, where this name appears as a putative class representative in paragraph 7(b)(xxxii) of the Original Master Complaint.

2.

By deleting the names of "Integrity Midwest Inc., d/b/a US Adventure RV," and "Tom Stinnett Holiday RV Center," as defendants identified in the original Master Complaint, wherever these names appear as defendants identified in the original Master Complaint.

Plaintiffs reserve the right to rename these entities as defendants in these proceedings, should discovery provide a basis for doing so.

3.

By substituting the name "Jayco, Inc." for the name "Jayco Enterprises, Inc." wherever

the latter name appears as a defendant identified in the original Master Complaint.

4.

By deleting the name of “Patriot Homes, Inc.” as a defendant identified in the original Master Complaint.

5.

By adding to the defendants listed in the Original and in the First Supplemental and Amended Complaints the following defendants, through the inclusion of the below-numbered paragraphs to read as follows:

lxxi. **Alliance Homes, Inc. d/b/a Adrian Homes** is upon information and belief a Georgia corporation, which conducts business in the States of Louisiana, Mississippi, Alabama and Texas, and which manufactured and supplied FEMA trailers or housing units as defined below pursuant to contracts with FEMA for use in those states.

lxxii. **Timberland RV Company d/b/a Adventure Manufacturing** is upon information and belief an Indiana corporation, which conducts business in the States of Louisiana, Mississippi, Alabama and Texas, and which manufactured and supplied FEMA trailers or housing units as defined below pursuant to contracts with FEMA for use in those states.

lxxiii. **Champion Home Builders Co.** is upon information and belief a Michigan corporation, which conducts business in the States of Louisiana, Mississippi, Alabama and Texas, and which manufactured and supplied FEMA trailers or housing units as defined below pursuant to contracts with FEMA for use in those states.

lxxiv. **Heartland Recreational Vehicles, LLC** is upon information and belief an Indiana company, which conducts business in the States of Louisiana, Mississippi, Alabama and Texas, and which manufactured and supplied FEMA trailers or housing units as defined below pursuant to contracts with FEMA for use in those states.

lxxv. **Hy-Line Enterprises, Inc.** is upon information and belief an Indiana corporation, which conducts business in the States of Louisiana, Mississippi, Alabama and Texas, and which manufactured and supplied FEMA trailers or

housing units as defined below pursuant to contracts with FEMA for use in those states.

lxxvi. **Lexington Homes** is upon information and belief a Mississippi corporation, which conducts business in the States of Louisiana, Mississippi, Alabama and Texas, and which manufactured and supplied FEMA trailers or housing units as defined below pursuant to contracts with FEMA for use in those states.

lxxvii. **Townhomes, LLC** is upon information and belief a Florida company, which conducts business in the States of Louisiana, Mississippi, Alabama and Texas, and which manufactured and supplied FEMA trailers or housing units as defined below pursuant to contracts with FEMA for use in those states.

lxxviii. **Homes of Merit, Inc.** is upon information and belief a Florida corporation, which conducts business in the States of Louisiana, Mississippi, Alabama and Texas, and which manufactured and supplied FEMA trailers or housing units as defined below pursuant to contracts with FEMA for use in those states.

lxxix. **Play'Mor Trailers, Inc.** is upon information and belief a Missouri corporation, which conducts business in the State of Louisiana, Mississippi, Alabama and Texas, and which manufactured and supplied FEMA trailers or housing units as defined below pursuant to contracts with FEMA for use in those states.

lxxx. **Dreams R.V. Sales, Inc.** is upon information and belief a Florida corporation, which conducts business in the State of Louisiana, Mississippi, Alabama and Texas, and which manufactured and supplied FEMA trailers or housing units as defined below pursuant to contracts with FEMA for use in those states.

lxxxii. **Sunnybrook R V, Inc.** is upon information and belief an Indiana corporation, which conducts business in the State of Louisiana, Mississippi, Alabama and Texas, and which manufactured and supplied FEMA trailers or housing units as defined below pursuant to contracts with FEMA for use in those states.

lxxxii. **Patriot Homes of Texas, L.P** is upon information and belief a Texas limited partnership, which conducts business in the State of Louisiana, Mississippi, Alabama and Texas, and which manufactured and supplied FEMA trailers or housing units as defined below pursuant to contracts with FEMA for use in those states.

lxxxiii: **Patriot Manufacturing, Inc.** is upon information and belief a New Jersey corporation, which conducts business in the State of Louisiana, Mississippi, Alabama and Texas, and which manufactured and supplied FEMA trailers or housing units as defined below pursuant to contracts with FEMA for use in those states.

6.

By adding a new paragraph to the original Master Complaint, to be numbered paragraph 7(c), and to read as follows:

7(c) The plaintiffs named in the foregoing subparagraphs 7(a) and (b) have experienced injurious exposure to formaldehyde as a direct result of residing in emergency housing units furnished through FEMA after Hurricanes Katrina or Rita, and manufactured by the following defendants:

- (1) in the case of plaintiff Jessica R. Pujol, the unit was manufactured by Pilgrim International, Inc.;
- (2) in the case of plaintiff Jill N. Pujol, the unit was manufactured by Pilgrim International, Inc.;
- (3) in the case of plaintiff Joseph M. Pujol, the unit was manufactured by Pilgrim International, Inc.;
- (4) in the case of plaintiff Stephanie G. Pujol, the unit was manufactured by Pilgrim International, Inc.;
- (5) in the case of plaintiff Elizabeth Lisa Nguyen, the unit was manufactured by Gulf Stream Coach, Inc.;
- (6) in the case of plaintiff Isabella Nichole Thomas, the unit was manufactured by Gulf Stream Coach, Inc.;
- (7) in the case of plaintiff Phuong Kim Thomas, the unit was manufactured by Gulf Stream Coach, Inc.;
- (8) in the case of plaintiff Sean Gary Thomas, the unit was manufactured by Gulf Stream Coach, Inc.;
- (9) in the case of plaintiff Duran Battie, Sr., the unit was manufactured by Timberland RV Company d/b/a Adventure Manufacturing;

- (10) in the case of plaintiff Joycelyn Beasley, the unit was manufactured by Jayco, Inc.;
- (11) in the case of plaintiff Steven Beasley, the unit was manufactured by Jayco, Inc.;
- (12) in the case of plaintiff Thomas Anthony Bergens, the unit was manufactured by Starcraft RV, Inc.;
- (13) in the case of plaintiff L. C. Bingham, the unit was manufactured by Cavalier Home Builders, LLC;
- (14) in the case of plaintiff Barry Bourgeois, the unit was manufactured by Gulf Stream Coach, Inc.;
- (15) in the case of plaintiff Jesse Brown, the unit was manufactured by Heartland Recreational Vehicles, LLC;
- (16) in the case of plaintiff Trina Brown, the unit was manufactured by Heartland Recreational Vehicles, LLC;
- (17) in the case of plaintiff Anthony Bruno, Jr., the unit was manufactured by Fleetwood;
- (18) in the case of plaintiff Patricia A. Burr, the unit was manufactured by Morgan Building & Spas, Inc. and/or Morgan Building Systems, Inc.;
- (19) in the case of plaintiff LaRay Maurice Carey, the unit was manufactured by Keystone RV Company;
- (20) in the case of plaintiff Jerome Culler, the unit was manufactured by Gulf Stream Coach, Inc.;
- (21) in the case of plaintiff Dione Davis, the unit was manufactured by Gulf Stream Coach, Inc.;
- (22) in the case of plaintiff Dorothy Deal, the unit was manufactured by Fleetwood;
- (23) in the case of plaintiff Heather Robertson-Durand, the unit was manufactured by Fleetwood;
- (24) in the case of plaintiff Matthew Durand, the unit was manufactured by Fleetwood;
- (25) in the case of plaintiff Teresa Certoma Femia, the unit was manufactured by Starcraft RV, Inc.;

- (26) in the case of plaintiff Renay Marie Gardner, the unit was manufactured by Pilgrim International, Inc.;
- (27) in the case of plaintiff Damon Gordon, the unit was manufactured by Fleetwood;
- (28) in the case of plaintiff Shelia Gordon, the unit was manufactured by Fleetwood;
- (29) in the case of plaintiff Latonya London, the unit was manufactured by Coachmen Industries, Inc. and/or Coachmen Recreational Vehicle Company, LLC;
- (30) in the case of plaintiff Lakeesha Lightell, the unit was manufactured by Stewart Park Homes;
- (31) in the case of plaintiff Lois Perkinson, the unit was manufactured by Coachmen Industries, Inc. and/or Coachmen Recreational Vehicle Company, LLC;
- (32) in the case of plaintiff Ashley Peters, the unit was manufactured by KZRV, LP;
- (33) in the case of plaintiff Joyce Peters, the unit was manufactured by KZRV, LP;
- (34) in the case of plaintiff Salvador Peters, Jr., the unit was manufactured by KZRV, LP;
- (35) in the case of plaintiff Salvador Peters, Sr., the unit was manufactured by KZRV, LP;
- (36) in the case of plaintiff Trevor Raphiel, the unit was manufactured by Travel Star by Starcraft;
- (37) in the case of plaintiff Lawrence Robertson, the unit was manufactured by Monaco Coach Corporation;
- (38) in the case of plaintiff Penny Robertson, the unit was manufactured by Monaco Coach Corporation;
- (39) in the case of plaintiff David Semien, Jr., the unit was manufactured by American Camper Manufacturing, LLC d/b/a Ameri-Camp;
- (40) in the case of plaintiff Sandra Semien, the unit was manufactured by American Camper Manufacturing, LLC d/b/a Ameri-Camp;
- (41) in the case of plaintiff Eric Albert Smith, the unit was manufactured by Pilgrim International, Inc.;

- (42) in the case of plaintiff Margaret Thomas, the unit was manufactured by American Camper Manufacturing, LLC d/b/a Ameri-Camp;
- (43) in the case of plaintiff Alvin Williby, Sr., the unit was manufactured by Gulf Stream Coach, Inc.;
- (44) in the case of plaintiff Luann Workman, the unit was manufactured by Gulf Stream Coach, Inc.;
- (45) in the case of plaintiff Letecheia Acker, the unit was manufactured by Keystone RV Company;
- (46) in the case of plaintiff Sandra Anderson, who resided in two units, the first unit was a travel trailer manufactured by Gulf Stream Coach, Inc., and the second unit was a mobile home manufactured River Birch Homes, Inc. and/or River Birch Homes, L.L.C.
- (47) in the case of plaintiff Keena Magee, the unit was manufactured by Forest River, Inc.;
- (48) in the case of plaintiff Charles Meshack, the unit was manufactured by Coachman;
- (49) in the case of plaintiff George Posey, the unit was manufactured by Gulf Stream Coach, Inc.;
- (50) in the case of plaintiff Jerry Stewart, the units were manufactured by Lakeside Park Homes, Inc. and Gulf Stream Coach, Inc.;
- (51) in the case of plaintiff Angela Wilkerson, the unit was manufactured by Coachmen Industries, Inc. and/or Coachmen Recreational Vehicle Company, LLC;
- (52) in the case of plaintiff Cedric Wilkerson, Sr., the unit was manufactured by Coachmen Industries, Inc. and/or Coachmen Recreational Vehicle Company, LLC;
- (53) in the case of plaintiff Sylvia Keyes, the unit was manufactured by Fleetwood;
- (54) in the case of plaintiff Betty White, the unit was manufactured by Forest River, Inc.;
- (55) in the case of plaintiff Kellina Biddle, the unit was manufactured by KZR RV, LP;

- (56) in the case of plaintiff Adrina McCray, the unit was manufactured by KZRV, LP;
- (57) in the case of plaintiff Ronald Morgan, the unit was manufactured by KZRV, LP;
- (58) in the case of plaintiff Terra Morgan, the unit was manufactured by KZRV, LP;
- (59) in the case of plaintiff David Semien, Sr., the unit was manufactured by American Camper Manufacturing, LLC d/b/a Ameri-Camp;
- (60) in the case of plaintiff Brittney Stephens Miller, the unit was manufactured by Dutchmen Manufacturing, Inc./Thor Industries, Inc.;
- (61) in the case of plaintiff Cherish Stephens, the unit was manufactured by Dutchmen Manufacturing, Inc./Thor Industries, Inc.;
- (62) in the case of plaintiff Sherry Trollinger, the unit was manufactured by Fleetwood.

7.

By adding a new paragraph to the original Master Complaint, to be numbered paragraph

7(d), and to read as follows:

7(d) In addition to the named plaintiffs identified in the foregoing paragraphs 7(a), (b), and (c), the following also are named plaintiffs exposed to injurious levels of formaldehyde as a direct result of residing in emergency housing units furnished through FEMA after Hurricanes Katrina and Rita, and manufactured by the following defendants:

- (1) in the case of plaintiff class member Barry P. Dominguez, the unit was manufactured by DS Corp.;
- (2) in the case of plaintiff class member Deborah Adkins, the unit was manufactured by Dutch Housing d/b/a Champion Homes;
- (3) in the case of plaintiff class member Dennis Adkins, the unit was manufactured by Dutch Housing d/b/a Champion Homes;
- (4) in the case of plaintiff class member Richard Rust, the unit was manufactured by Dutch Housing d/b/a Champion Homes;
- (5) in the case of plaintiff class member Jeremy Rust, the unit was manufactured by Dutch Housing d/b/a Champion Homes;

- (6) in the case of plaintiff class member Logan Rust, the unit was manufactured by Dutch Housing d/b/a Champion Homes;
- (7) in the case of plaintiff class member Samien Rust, the unit was manufactured by Dutch Housing d/b/a Champion Homes;
- (8) in the case of plaintiff class member Barbara Ann Dillon, the unit was manufactured by Fleetwood Canada, Ltd.;
- (9) in the case of plaintiff class member Latrice Collins, the unit was manufactured by Fleetwood Homes of North Carolina, Inc.;
- (10) in the case of plaintiff class member Ruby Freeman, the unit was manufactured by Fleetwood Homes of North Carolina, Inc.;
- (11) in the case of plaintiff class member Shontay Fontenot, the unit was manufactured by Giles Family Holdings, Inc.;
- (12) in the case of plaintiff class member Johnathan Fontenot, Sr., the unit was manufactured by Giles Family Holdings, Inc.;
- (13) in the case of plaintiff class member Johnathan Fontenot, Jr., the unit was manufactured by Giles Family Holdings, Inc.;
- (14) in the case of plaintiff class member Justin Fontenot, the unit was manufactured by Giles Family Holdings, Inc.;
- (15) in the case of plaintiff class member Hailey Fontenot, the unit was manufactured by Giles Family Holdings, Inc.;
- (16) in the case of plaintiff class member Pamela S. Benoit, the unit was manufactured by Horton Homes, Inc.;
- (17) in the case of plaintiff class member Betty Adams, the unit was manufactured by Lakeside Park Homes, Inc.;
- (18) in the case of plaintiff class member John Adams, the unit was manufactured by Lakeside Park Homes, Inc.;
- (19) in the case of plaintiff class member Crystal Gumm, the unit was manufactured by Patriot Homes of Texas, L.P and/or Patriot Manufacturing, Inc.;

- (20) in the case of plaintiff class member Joseph Jack, the unit was manufactured by Patriot Homes of Texas, L.P and/or Patriot Manufacturing, Inc.;
- (21) in the case of plaintiff class member Betty Thomas, the unit was manufactured by Philips Products, Inc.;
- (22) in the case of plaintiff class member Frank Alfred, the unit was manufactured by Philips Products, Inc.;
- (23) in the case of plaintiff class member Gloria Alfred, the unit was manufactured by Philips Products, Inc.;
- (24) in the case of plaintiff class member Courtney Alfred, the unit was manufactured by Philips Products, Inc.;
- (25) in the case of plaintiff class member Eumakia Alfred, the unit was manufactured by Philips Products, Inc.;
- (26) in the case of plaintiff class member Christopher Thomas, the unit was manufactured by Philips Products, Inc.;
- (27) in the case of plaintiff class member Jacqueline Deddaux, the unit was manufactured by Redman Homes Inc. f/k/a Dutch Homes;
- (28) in the case of plaintiff class member Amaris McGallion, the unit was manufactured by Southern Energy Homes, Inc.;
- (29) in the case of plaintiff class member Lonnie McGallion, the unit was manufactured by Southern Energy Homes, Inc.;
- (30) in the case of plaintiff class member Mary Harris, individually and as representative of the estate of Artis Harris, the unit was manufactured by SunRay RV, LLC;
- (31) in the case of plaintiff class member Edward Ballet, the unit was manufactured by Thor California doing business in California as Thor Manufacturing;
- (32) in the case of plaintiff class member Natley Mitchell, the unit was manufactured by Destiny Industries, LLC;
- (33) in the case of plaintiff class member Darius Mitchell, the unit was manufactured by Destiny Industries, LLC;

- (34) in the case of plaintiff class member Parish Mitchell, the unit was manufactured by Destiny Industries, LLC;
- (35) in the case of plaintiff class member Nakesia Mitchell, the unit was manufactured by Destiny Industries, LLC;
- (36) in the case of plaintiff class member Joseph Mitchell, the unit was manufactured by Destiny Industries, LLC;
- (37) in the case of plaintiff class member Joshua Mitchell, the unit was manufactured by Destiny Industries, LLC;
- (38) in the case of plaintiff class member William Bridges, the unit was manufactured by Dutchmen Manufacturing, Inc.;
- (39) in the case of plaintiff class member Juanita Bridges, the unit was manufactured by Dutchmen Manufacturing, Inc.;
- (40) in the case of plaintiff class member Rose Bright, the unit was manufactured by Dutchmen Manufacturing, Inc.;
- (41) in the case of plaintiff class member Dana Christmas, the unit was manufactured by Dutchmen Manufacturing, Inc.;
- (42) in the case of plaintiff class member Danielle Christmas, the unit was manufactured by Dutchmen Manufacturing, Inc.;
- (43) in the case of plaintiff class member Gregory Lane, the unit was manufactured by Dutchmen Manufacturing, Inc.;
- (44) in the case of plaintiff class member Lucinda Lane, the unit was manufactured by Dutchmen Manufacturing, Inc.;
- (45) in the case of plaintiff class member Peter Daunoy III, the unit was manufactured by Layton Homes Corp.;
- (46) in the case of plaintiff class member Charlotte Evans, the unit was manufactured either by defendant Liberty Homes, Inc. or by defendant Liberty RV & Marine, Inc.;
- (47) in the case of plaintiff class member Percy Evans, the unit was manufactured either by defendant Liberty Homes, Inc. or by defendant Liberty RV & Marine, Inc.;

- (48) in the case of plaintiff class member Ella Flowers, the unit was manufactured by Scotbilt Homes, Inc.;
- (49) in the case of plaintiff class member James Aaron Barnes, Jr., the unit was manufactured by Scotbilt Homes, Inc.;
- (50) in the case of plaintiff class member Andre Pravata, the unit was manufactured by Waverlee Homes, Inc.;
- (51) in the case of plaintiff class member Skyler Pravata, the unit was manufactured by Waverlee Homes, Inc.;
- (52) in the case of plaintiff class member Maddie Pravata, the unit was manufactured by Waverlee Homes, Inc.;
- (53) in the case of plaintiff class member Maragrita Solis, the unit was manufactured by Silver Creek Homes, Inc.;
- (54) in the case of plaintiff class member Marcilio Ayala, the unit was manufactured by Silver Creek Homes, Inc.;
- (55) in the case of plaintiff class member Linda Maydonado-West, the unit was manufactured by Palm Harbor Homes, Inc., Palm Harbor Manufacturing, Inc. or Palm Harbor Albermarle, LLC;
- (56) in the case of plaintiff class member Marcie Beverly, the unit was manufactured by Alliance Homes, Inc. d/b/a Adrian Homes;
- (57) in the case of plaintiff class member Lee Williams, the unit was manufactured by Timberland RV Company d/b/a Adventure Manufacturing;
- (58) in the case of plaintiff class member Libby Sylve, the unit was manufactured by Timberland RV Company d/b/a Adventure Manufacturing;
- (59) in the case of plaintiff class member Ashante Sylve, the unit was manufactured by Timberland RV Company d/b/a Adventure Manufacturing;
- (60) in the case of plaintiff class member Hailey Sylve, the unit was manufactured by Timberland RV Company d/b/a Adventure Manufacturing;
- (61) in the case of plaintiff class member Thelma Howard, the unit was manufactured by Timberland RV Company d/b/a Adventure Manufacturing;

- (62) in the case of plaintiff class member Ardellia Hawkins, the unit was manufactured by Champion Enterprises, Inc.;
- (63) in the case of plaintiff class member Lillian Foley, individually and on behalf of deceased son Samuel Foley, the unit was manufactured by Heartland Recreational Vehicles, LLC;
- (64) in the case of plaintiff class member Paula Tatum, the unit was manufactured by Heartland Recreational Vehicles, LLC;
- (65) in the case of plaintiff class member Roderick Murray, the unit was manufactured by Heartland Recreational Vehicles, LLC;
- (66) in the case of plaintiff class member Kelvin Murray, the unit was manufactured by Heartland Recreational Vehicles, LLC;
- (67) in the case of plaintiff class member Larry Jenson Jackson, the unit was manufactured by Hy-Line Enterprises, Inc.;
- (68) in the case of plaintiff class member Centra Nell Meyers, the unit was manufactured by Hy-Line Enterprises, Inc.;
- (69) in the case of plaintiff class member Margaret Veal Gaskin, individually and as a representative of the estate of Arthur Gaskin, the unit was manufactured by Lexington Homes;
- (70) in the case of plaintiff class member Debra Delone, the unit was manufactured by Lexington Homes;
- (71) in the case of plaintiff class member Donovan Delone, the unit was manufactured by Lexington Homes;
- (72) in the case of plaintiff class member Larry Parker, the unit was manufactured by Townhomes, LLC;
- (73) in the case of plaintiff class member Maria Monique Parker, the unit was manufactured by Townhomes, LLC;
- (74) in the case of plaintiff class member Tyler Paul Ardoin, the unit was manufactured by Townhomes, LLC;
- (75) in the case of plaintiff class member Mickayla Ardoin, the unit was manufactured by Townhomes, LLC;

- (76) in the case of plaintiff class member Nicholas Parker, the unit was manufactured by Townhomes, LLC;
- (77) in the case of plaintiff class member Chloe Parker, the unit was manufactured by Townhomes, LLC;
- (78) in the case of plaintiff class member James Smith, Sr., the unit was manufactured by Homes of Merit, Inc.;
- (79) in the case of plaintiff class member James Smith, Jr., the unit was manufactured by Homes of Merit, Inc.;
- (80) in the case of plaintiff class member Michael Tracy, the unit was manufactured by Homes of Merit, Inc.;
- (81) in the case of plaintiff class member Sheila Smith, the unit was manufactured by Homes of Merit, Inc.;
- (82) in the case of plaintiff class member Mirissa Smith, the unit was manufactured by Homes of Merit, Inc.;
- (83) in the case of plaintiff class member Craig Ray, Sr, as legal representative of the Estate of Melinda Ray, the unit was manufactured by Play'Mor Trailers, Inc.;
- (84) in the case of plaintiff class member Craig Ray, Jr., the unit was manufactured by Play'Mor Trailers, Inc.;
- (85) in the case of plaintiff class member Wanda Reynaud, the unit was manufactured by Cavalier Home Builders, LLC and/or Cavalier Homes Inc.;
- (86) in the case of plaintiff class member Cheryl Clark, the unit was manufactured by Cavalier Home Builders, LLC and/or Cavalier Homes Inc.;
- (87) in the case of plaintiff class member Robert Kelly, the unit was manufactured by Cavalier Home Builders, LLC and/or Cavalier Homes Inc.;
- (88) in the case of plaintiff class member Mary Kelly, the unit was manufactured by Cavalier Home Builders, LLC and/or Cavalier Homes Inc.;
- (89) in the case of plaintiff class member Carl Tasker, the unit was manufactured by Fleetwood Canada, Ltd.;
- (90) in the case of plaintiff class member Fatima Estrada, the unit was manufactured

by Fleetwood Canada, Ltd.;

- (91) in the case of plaintiff class member Roxanne Rome, the unit was manufactured by Fleetwood Canada, Ltd.;
- (92) in the case of plaintiff class member Ben Moreland, the unit was manufactured by Frontier RV, Inc.;
- (93) in the case of plaintiff class member Glenda Moreland, the unit was manufactured by Frontier RV, Inc.;
- (94) in the case of plaintiff class member Allen Clifton, the unit was manufactured by Frontier RV, Inc.;
- (95) in the case of plaintiff class member Donald Welds, the unit was manufactured by Frontier RV, Inc.;
- (96) in the case of plaintiff class member Bertha Jones, the unit was manufactured by Frontier RV, Inc.;
- (97) in the case of plaintiff class member Albert Theriot, the unit was manufactured by Recreation By Design, LLC.;
- (98) in the case of plaintiff class member Lorraine Surtain, the unit was manufactured by Recreation By Design, LLC.;
- (99) in the case of plaintiff class member Margaret Geagan, the unit was manufactured by Recreation By Design, LLC.;
- (100) in the case of plaintiff class member Johnnie Tart, the unit was manufactured by Recreation By Design, LLC.;
- (101) in the case of plaintiff class member Johnny White, the unit was manufactured by Recreation By Design, LLC.;
- (102) in the case of plaintiff class member Douglas Hill, the unit was manufactured by Recreation By Design, LLC.;
- (103) in the case of plaintiff class member Annie Smith, the unit was manufactured by R-Vision, Inc.;
- (104) in the case of plaintiff class member Jacqueline Griffith-Gills, the unit was manufactured by R-Vision, Inc.;

- (105) in the case of plaintiff class member Shirley Sinclair, the unit was manufactured by R-Vision, Inc.;
- (106) in the case of plaintiff class member George Jones, the unit was manufactured by Skyline Corporation;
- (107) in the case of plaintiff class member Lula Jones, the unit was manufactured by Skyline Corporation;
- (108) in the case of plaintiff class member Sylvia Jones, the unit was manufactured by Skyline Corporation;
- (109) in the case of plaintiff class member Darryl Edward, the unit was manufactured by Skyline Corporation;
- (110) in the case of plaintiff class member Norman Wilson, the unit was manufactured by Sunray RV, LLC;
- (111) in the case of plaintiff class member Leishon Darby, the unit was manufactured by T. L. Industries, Inc.;
- (112) in the case of plaintiff class member Brian Darby, the unit was manufactured by T. L. Industries, Inc.;
- (113) in the case of plaintiff class member Andrea Fowler, the unit was manufactured by T. L. Industries, Inc.;
- (114) in the case of plaintiff class member Johnny George, the unit was manufactured by Vanguard Industries of Michigan, Inc. (a/k/a Palomino RV);
- (115) in the case of plaintiff class member Brenda Henry, the unit was manufactured by Vanguard Industries of Michigan, Inc. (a/k/a Palomino RV);
- (116) in the case of plaintiff class member Jerron George, the unit was manufactured by Vanguard Industries of Michigan, Inc. (a/k/a Palomino RV);
- (117) in the case of plaintiff class member Bruce Jordan, the unit was manufactured by Vanguard Industries of Michigan, Inc. (a/k/a Palomino RV);
- (118) in the case of plaintiff class member Ranika Jordan, the unit was manufactured by Vanguard Industries of Michigan, Inc. (a/k/a Palomino RV);
- (119) in the case of plaintiff class member Emile George, the unit was manufactured by

Sunnybrook R V, Inc.;

- (120) in the case of plaintiff class member Simone Frank, the unit was manufactured by Sunnybrook R V, Inc.;
- (121) in the case of plaintiff class member Darrell Frank, the unit was manufactured by Sunnybrook R V, Inc.;
- (122) in the case of plaintiff class member Micha Pichon, the unit was manufactured by Sunnybrook R V, Inc.;
- (123) in the case of plaintiff class member Linda Davis, the unit was manufactured by CMH Manufacturing, Inc.;
- (124) in the case of plaintiff class member Wilford Jackson, the unit was manufactured by CMH Manufacturing, Inc.;
- (125) in the case of plaintiff class member Mauro Lopez, the unit was manufactured by CMH Manufacturing, Inc.;
- (126) in the case of plaintiff class member Jordan Vaughn, the unit was manufactured by Design Homes, Inc.;
- (127) in the case of plaintiff class member Enna Williams, the unit was manufactured by Design Homes, Inc.;
- (128) in the case of plaintiff class member Frank Alfred, the unit was manufactured by Philips Products, Inc.;
- (129) in the case of plaintiff class member Betty Thomas, the unit was manufactured by Philips Products, Inc.;
- (130) in the case of plaintiff class member Derrell Madison, the unit was manufactured by Coachmen Industries, Inc. and/or Coachmen Recreational Vehicle Company, LLC;
- (131) in the case of plaintiff Maxine Montgomery, the unit was manufactured by Gulf Stream Coach, Inc.;
- (132) in the case of plaintiff Kawanda White, the unit was manufactured by Clayton Homes of Lafayette, Inc. (f/k/a Clayton Homes, Inc.);
- (133) in the case of plaintiff Bryan Rutledge, the unit was manufactured by Clayton

Homes of Lafayette, Inc. (f/k/a Clayton Homes, Inc.);

- (134) in the case of plaintiff Shalonda Jones, the unit was manufactured by Clayton Homes of Lafayette, Inc. (f/k/a Clayton Homes, Inc.);
- (135) in the case of plaintiff Constance Holden, the unit was manufactured by Clayton Homes of Lafayette, Inc. (f/k/a Clayton Homes, Inc.);
- (136) in the case of plaintiff Lena Brown, the unit was manufactured by Oak Creek Homes, L.P. and/or Oak Creek Homes, Inc.;
- (137) in the case of plaintiff Jason Pohlman, the unit was manufactured by Oak Creek Homes, L.P. and/or Oak Creek Homes, Inc.;
- (138) in the case of plaintiff Thomas Sullivan, the unit was manufactured by Oak Creek Homes, L.P. and/or Oak Creek Homes, Inc.;
- (139) in the case of plaintiff Lena Brown, the unit was manufactured by Oak Creek Homes, L.P. and/or Oak Creek Homes, Inc.;
- (140) in the case of plaintiff Faye Williams, the unit was manufactured by Superior Homes, LLC.;

8.

By adding a new paragraph to the original Master Complaint, to be numbered paragraph

7(e), and to read as follows:

7(e) As to any and all defendant manufacturers whose housing units are not presently identified or identifiable as having been inhabited by a named plaintiff/putative class member or by a named member of the plaintiff class, plaintiffs aver that:

- (1) the claims of the putative class representatives herein are typical of the claims of the unnamed class members who resided in any such units;
- (2) the putative class representatives herein will adequately represent the interests of any class members who resided in such units;
- (3) one or more juridical links exist between and among all named defendant manufacturers, based in whole or in part upon arrangements made for the provision of these manufacturer's housing units through a single governmental

entity, i.e., FEMA; and the resulting opportunity for a single and expeditious resolution of plaintiffs' claims in these proceedings therefore obviates the need at this time to link the identity of an unnamed class member to a unit manufactured by a particular defendant whose units are not yet identified as having been inhabited by a named plaintiff class member.

9.

By amending paragraph 83 of the Original Master Complaint, to read as follows:

83. Named plaintiffs bring this action as proposed class representatives on behalf of themselves and all others similarly-situated, in the respects stated herein and below.

WHEREFORE, plaintiffs respectfully supplement and amend the Original and the First Supplemental and Amended Master Complaints in the foregoing respects, and they otherwise reiterate and re-aver all of the allegations, claims, and prayers for relief contained therein.

Respectfully submitted:

**FEMA TRAILER FORMALDEHYDE
PRODUCT LIABILITY LITIGATION**

BY: s/Gerald E. Meunier
GERALD E. MEUNIER, #9471
PLAINTIFFS' CO-LIAISON COUNSEL
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STEERING COMMITTEE**

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RAUL BENCOMO, #2932
FRANK D'AMICO, JR., #17519
MATT MORELAND, #24567
LINDA NELSON, #9938
RONNIE PENTON, #10462

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2008, 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