

referenced in his report and/or subsequent deposition testimony, including reasonable inferences arising therein.

- 2. David J. Favre, Sr.**
250 Citizen St.
Bay St. Louis, MS 39520
Phone: (228) 216-8726

Mr. Favre's report, curriculum vitae, and testifying history have been served upon Defendants and are attached hereto as Exhibit B. Mr. Favre may be called to testify regarding the adjustment of the insurance claims related to the McIntosh property and the costs of repairs of the property and as to any other subjects or opinions referenced in his report or subsequent deposition testimony, including reasonable inferences arising therein.

- 3. Louis G. Fey Jr.**
Risk Management Consultant
Fey Consulting LLC
2136 N. Woodchase Ct
Baton Rouge, LA 70808
Phone: (225) 362-3919

Mr. Fey's report, curriculum vitae, and testifying history have been served upon Defendants and are attached hereto as Exhibit C. Mr. Fey may be called to testify regarding insurance industry practices in adjusting and handling claims and as to any other subjects or opinions referenced in his report or subsequent deposition testimony, including reasonable inferences arising therein.

- 4. Dr. Patrick J. Fitzpatrick, Ph.D**
Associate Research Professor
Mississippi State University
Stennis Space Center, MS 39529
Phone: (228) 688-1157
Fax: (228) 688-7100

Dr. Fitzpatrick's report, curriculum vitae, and testifying history have been served upon Defendants and are attached hereto as Exhibit D. Dr. Fitzpatrick may be called to testify regarding the wind and storm surge created by Hurricane Katrina and the timing and effect of the storm's forces as they impacted the McIntosh home and as to any other subjects or opinions referenced in his report or subsequent deposition testimony, including reasonable inferences arising therein.

5. John A. Fowler, P.E.

Fowler Engineers
P.O. Box 7699
Spanish Fort, Alabama 36577
Phone: (251) 626-3821
Fax: (251) 626-3939

Mr. Fowler's report, curriculum vitae, and testifying history have been served upon Defendants and are attached hereto as Exhibit E. Mr. Fowler may be called to testify regarding the effects of Hurricane Katrina on Ron and Linda Mucha's residence located at 2555 South Shore Drive, Biloxi, Mississippi 39532, less than 400 feet from the McIntosh residence and as to any other subjects or opinions referenced in his report or subsequent deposition testimony, including reasonable inferences arising therein.

6. Joe Gregg

200 N. Duncan St
Marine, IL 62061
Phone: (314) 422-8902
Fax: (618) 654-3355

Mr. Gregg's report, curriculum vitae, and testifying history have been served upon Defendants and are attached hereto as Exhibit F. Mr. Gregg may be called to testify regarding the adjustment of the McIntoshes' flood claim and the cost to repair the McIntosh property and as to any other subjects or opinions referenced in his report or subsequent deposition testimony, including reasonable inferences arising therein.

7. Dr. R. Ralph Sinno, Ph.D.

Professor of Civil Engineering
Mississippi State University
Mississippi State University, MS 39762-1798
Phone: (662) 325-3737
Fax: (662) 325-7189

Dr. Sinno's report, curriculum vitae, and testifying history have been served upon Defendants and are attached hereto as Exhibit G. Dr. Sinno may be called to testify regarding the effects of Hurricane Katrina on the McIntosh home and as to any other subjects or opinions referenced in his report or subsequent deposition testimony, including reasonable inferences arising therein.

In addition to the Expert Reports filed with this Court, Relators have sent copies of additional materials related to those reports, but too voluminous to file, to Defendants.

II. UNRETAINED WITNESSES WHO MAY TESTIFY TO OPINIONS WITHIN THE REALM OF THEIR EXPERTISE

The Relators also designate the following individuals who are not retained or specially employed to provide expert testimony but who may be called to offer opinions at trial.

1. Robert C. McVadon, Jr.

McVadon Enterprises, Inc.
450 Bordeaux Cove
Biloxi, MS 39531

Mr. McVadon is the contractor who rebuilt the McIntosh residence following Hurricane Katrina. He may be called to give testimony regarding the condition of the McIntosh residence following Hurricane Katrina, the work he and/or his subcontractors performed subsequent to Hurricane Katrina, the costs to rebuild the residence, any and all modifications of plans and/or changes to the structure, any and all observable damage to the home, and any other matter in any

way related to the work and/or rebuilding of the home. It is expected that the subject of testimony solicited from Mr. McVadon would be reflected in any and all records maintained during construction and/or in any prior deposition testimony on related subjects. As discovery has not been conducted as to this witness, the Relators reserve the right to solicit testimony from McVadon as to any matter within the realm of his expertise that is reasonably related to the issues pending in this lawsuit, and the right is further reserved to supplement this designation as necessary. The scope of this designation further includes any and all subcontractors or other persons who performed work on the McIntosh residence but whose identities are not presently known.

- 2. A Representative from the Federal Emergency Management Agency (“FEMA”)**
500 C Street SW
Washington, DC 20472
Phone: (202) 646-2500

The Relators may call a FEMA Representative to testify as to any and all FEMA directives and/or written instructions or memoranda regarding claims handling procedures following Hurricane Katrina and/or regarding standard FEMA directives and/or instructions for submitting flood claims. The Relators may further solicit testimony from FEMA or any representative, agent, employee, or contractor of FEMA who participated in any way in the collection of data in the vicinity of the McIntosh residence, including data contained in the Final Coastal and Riverine High Water Mark Collection for Hurricane Katrina in Mississippi reflecting the high water mark of 18.6 feet. The identity of the appropriate persons is not known at this time, but Relators reserve the right to solicit testimony on any of the above-mentioned subjects and supplement this designation further as necessary as discovery proceeds.

3. Cori Rigsby
2409 Cleveland Avenue
Pascagoula, MS 39567
Phone: (228) 324-4407

4. Kerri Rigsby
2916 N. 4th Street
Ocean Springs, MS
Phone: (228) 324-4177

The Relators may be called to provide testimony regarding the FEMA procedures for adjusting flood claims, the instructions they received from State Farm on how to adjust claims following Katrina, and the adjustment and handling of the McIntosh flood claim. The opinions of the Relators are set forth in numerous deposition transcripts, all available to the Defendants, and the right is reserved to question the Relators on any and all subjects discussed therein, and the right is further reserved to solicit their opinion testimony regarding any such subjects. The right is further reserved to solicit opinions from Kerri Rigsby as to any and all matters testified to during the hearing before this Court in May, 2009.

5. Experts Who Examined Neighboring Properties

The Relators reserve the right to take discovery from and use as evidence any and all testimony of any person regarded as an expert in any field who has pertinent and relevant information regarding the effects of Hurricane Katrina on properties in the McIntosh neighborhood. This may include claims adjustors, engineers, damage experts, causation experts, weather experts, and/or others who may be identified in discovery as having performed investigation and/or reached opinions going to the damages caused by Hurricane Katrina in this neighborhood. Relators reserve the right to supplement this designation as necessary and solicit testimony from such persons as appropriate during both discovery and trial.

6. State Farm Personnel, Employees, Contractors, Agents

The Relators reserve the right to take discovery from and use as evidence any and all testimony solicited from any State Farm personnel, employee, contractor, and/or agent, including but not limited to any and all witnesses listed or referenced in written discovery. At this time, such opinions cannot be designated specifically because discovery has not been conducted. Relators reserve the right to supplement this designation as necessary and to solicit opinion testimony from such persons as appropriate during both discovery and trial.

7. Haag Personnel, Employees, Contractors, Agents

The Relators reserve the right to take discovery from and use as evidence any and all testimony solicited from any Haag personnel, employee, contractor, and/or agent, including but not limited to any and all witnesses listed or referenced in written discovery. At this time, such opinions cannot be designated specifically because discovery has not been conducted. Relators reserve the right to supplement this designation as necessary and to solicit opinion testimony from such persons as appropriate during both discovery and trial.

8. Forensic Personnel, Employees, Contractors, Agents

The Relators reserve the right to take discovery from and use as evidence any and all testimony solicited from any Forensic personnel, employee, contractor, and/or agent, including but not limited to any and all witnesses listed or referenced in written discovery. At this time, such opinions cannot be designated specifically because discovery has not been conducted. Relators reserve the right to supplement this designation as necessary and to solicit opinion testimony from such persons as appropriate during both discovery and trial. This designation includes but is not limited to Mr. Ford and Mr. Kelly.

The Relators do not concede that any expert designation, report or disclosure is required for the potential testimony of the unretained persons identified above, either under the Rules or any order of this Court, but such designations are provided out of an abundance of caution.

The Relators designate and reserve the right to call any expert designated by Defendants or called by Defendants at hearing or trial.

The Relators further reserve the right to solicit testimony from any person identified by any party as a fact witness in this case, which may require such witness to rely upon their specialized knowledge, training, experience, education, or expertise in a particular field or which may be considered "opinion" testimony. It is expected that such persons and any unretained persons would provide testimony consistent with any and all records they have generated and/or any testimony or statements provided to any person or party and within the realm of their expertise and training.

The Relators may also solicit expert testimony from any party in this case. It is expected that any opinions solicited from such parties would be opinions provided within the realm of their expertise and consistent with their business records and/or consistent with deposition testimony or statements provided on such subjects.

The Relators reserve the right to supplement this designation. The Relators reserve the right to designate additional experts and the Relators' experts reserve the right to supplement, amend, or modify any of the opinions expressed in their reports as additional information may become available through discovery and at trial.

The Relators reserve the right to solicit testimony from any witness, lay or otherwise, who may have relevant opinions within the realms of their expertise.

THIS the 29th day of January, 2010

Respectfully submitted,

/s/ C. Maison Heidelberg
C. MAISON HEIDELBERG, MB #9559
GINNY Y. KENNEDY, MB #102199

OF COUNSEL

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CERTIFICATE OF SERVICE

I, C. Maison Heidelberg, attorney for Cori Rigsby and Kerri Rigsby, do hereby certify that I have this day caused a true and correct copy of the foregoing instrument to be delivered to the following, via the means directed by the Court's Electronic Filing System and electronic mail:

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/s/ C. Maison Heidelberg