

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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IN RE: WORLD TRADE CENTER  
DISASTER SITE LITIGATION

21 MC 100 (AKH)

**CERTIFICATION OF  
JAMES E. TYRRELL, ESQ.  
IN SUPPORT OF MOTION FOR  
SUMMARY JUDGMENT ON BEHALF  
OF THE CITY OF NEW YORK  
AND ITS CONTRACTORS**

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MICHAEL ALLEVA,  
  
Plaintiff(s),  
  
v.  
  
CITY OF NEW YORK; ET ALS.,  
  
Defendants.

Civil Action No. 06 CV 08887

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RICHARD ARDISSON,  
  
Plaintiff(s),  
  
v.  
  
CITY OF NEW YORK; ET ALS.,  
  
Defendants.

Civil Action No. 05cv01364

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VINCENT BRIGANTI AND ROSEANN  
BRIGANTI,  
  
Plaintiff(s),  
  
v.  
  
CITY OF NEW YORK; ET ALS.,  
  
Defendants.

Civil Action No. 06cv03417

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RICHARD CALDERON AND NITZA  
CALDERON,  
  
Plaintiff(s),  
  
v.  
  
CITY OF NEW YORK; ET ALS.,  
  
Defendants.

Civil Action No. 06cv10267

<p>JAMES CANTORE AND HELEN CANTORE,  Plaintiff(s),  v.  7 WORLD TRADE COMPANY, LP; ET ALS.,  Defendants.</p>	<p>Civil Action No. 06cv10654</p>
<p>CALOGERO CARUSO AND DENISE CARUSO,  Plaintiff(s),  v.  CITY OF NEW YORK; ET ALS.,  Defendants.</p>	<p>Civil Action No. 06cv07962</p>
<p>LARON CASEY AND AYANA CASEY,  Plaintiff(s),  v.  PORT AUTHORITY OF NEW YORK AND NEW JERSEY; ET ALS.,  Defendants.</p>	<p>Civil Action No. 06cv08890</p>
<p>CHRISTOPHER CASTRO,  Plaintiff(s),  v.  CITY OF NEW YORK; ET ALS.,  Defendants.</p>	<p>Civil Action No. 06cv07287</p>
<p>JAMES FAHY AND IRMA FAHY,  Plaintiff(s),  v.  PORT AUTHORITY OF NEW YORK AND NEW JERSEY; ET ALS.,  Defendants.</p>	<p>Civil Action No. 06cv09545</p>
<p>ROBERT GALVANI AND DIANE GALVANI,</p>	<p>Civil Action No. 05cv10740</p>

Plaintiff(s), v. CITY OF NEW YORK; ET ALS., Defendants.	
JOSEPH GRECO AND JUDY GRECO, Plaintiff(s), v. CITY OF NEW YORK; ET ALS., Defendants.	Civil Action No. 05cv01228
PAUL HAUBER, AS EXECUTOR OF THE ESTATE OF RAYMOND HAUBER, Plaintiff(s), v. CITY OF NEW YORK; ET ALS., Defendants.	Civil Action No. 05cv09141
FRANK MALONE, Plaintiff(s), v. CITY OF NEW YORK; ET ALS., Defendants.	Civil Action No. 05cv04111
JOHN J. QUINN, Plaintiff(s), v. CITY OF NEW YORK; ET ALS., Defendants.	Civil Action No. 04cv07903
MICHAEL SHANAHAN AND GEORGENE SHANAHAN, Plaintiff(s), v. CITY OF NEW YORK; ET ALS., Defendants.	Civil Action No. 05cv01410

DAWN SORRENTO,

Plaintiff(s),

v.

CITY OF NEW YORK; ET ALS.,

Defendants.

Civil Action No. 06cv08547

DAVID WELLS AND CHYRELL WELLS,

Plaintiff(s),

PORT AUTHORITY OF NEW YORK AND  
NEW JERSEY; ET ALS.,

Defendants.

Civil Action No. 05cv01335

JAMES E. TYRRELL, JR. being duly sworn, deposes and says:

1. A true and accurate copy of the Court Database Response of Michael Alleva is attached hereto as Exhibit 1.
2. A true and accurate copy of the Deposition Transcript of Michael Alleva dated 10/30/2009 is attached hereto as Exhibit 2.
3. A true and accurate copy of the First Amended Core Discovery Response of Michael Alleva dated 8/22/2008 is attached hereto as Exhibit 3.
4. A true and accurate copy of the First Set of Supplemental and Amended Objections and Responses to the First set of Interrogatories Directed to Plaintiff Michael Alleva dated 8/11/2009 is attached hereto as Exhibit 4.
5. A true and accurate copy of Michael Alleva's Calendar bates stamped 06cv08887\_000001 through 06cv08887\_000008 is attached hereto as Exhibit 5.

6. A true and accurate copy of Mount Sinai Medical Center World Trade Center Worker and Volunteer Medical Screening Program records related to Michael Alleva bates stamped AllevaMichael06cv08887\_000209 through 000228 is attached hereto as Exhibit 6.
7. A true and accurate copy of the First Amended Core Discovery Response of Richard Ardisson dated 7/9/2008 is attached hereto as Exhibit 7.
8. A true and accurate copy of the Transcript of the examination of Richard Ardisson pursuant to 50(h) of the general municipal law dated 12/29/2008 is attached hereto as Exhibit 8.
9. A true and accurate copy of the Deposition Transcripts of Richard Ardisson dated 11/24/2009 and 1/15/2010 is attached hereto as Exhibit 9.
10. A true and accurate copy of the World Trade Center Emergency Response Progress Report September 11th to November 11, 2001 bates stamped BOVIS\_21MC100\_000374864 through 000374868 is attached hereto as Exhibit 10.
11. A true and accurate copy of the Amended Core Discovery Response of Vincent Briganti dated 7/14/2009 is attached hereto as Exhibit 11.
12. A true and accurate copy of the Personal Exposure Monitoring Record bates stamped CITY\_21MC100\_010237357 - CITY\_21MC100\_01237361 is attached hereto as Exhibit 12.
13. A true and accurate copy of the Core Discovery Response of Vincent Briganti dated 4/7/2008 is attached hereto as Exhibit 13.
14. A true and accurate copy of the Deposition Transcript of Roseann Briganti dated 11/18/2009 is attached hereto as Exhibit 14.

15. A true and accurate copy of the Deposition Transcripts of Vincent Briganti dated 9/18/2009, 10/8/2009 and 12/22/2009 is attached hereto as Exhibit 15.

16. A true and accurate copy of the Documents Produced by Dr. Mark Carney regarding Vincent Briganti bates stamped Carney 001 through 005 is attached hereto as Exhibit 16.

17. A true and accurate copy of the First Set of Supplemental and Amended Objections and Responses to the First set of Interrogatories Directed to Vincent Briganti dated 6/22/2009 is attached hereto as Exhibit 17.

18. A true and accurate copy of the Records obtained through subpoena directed to Bowler Lawrence related to the medical malpractice action entitled Vincent Briganti vs. Hsien Kwang Liu, MD bates number BowerLawrence Subp. Resp001280-001285; BowlerLawrence Subp. Resp003433-003443 is attached hereto as Exhibit 18.

19. A true and accurate copy of the Seasons Contracting's payroll and sign-in records confirming Briganti worked on the WTC project through November 14, 2001 bates stamped TURN\_21MC100\_00023801 - 00023806; TURN\_21MC100\_000265288 - 000265290; TURN\_21MC100\_000263887 - 000263889; TURN\_21MC100\_000226178 - 000226182; TURN\_21MC100\_000226184 - 000226188; TURN\_21MC100\_000226189 - 000226192; TURN\_21MC100\_000226406 - 000226407; TURN\_21MC100\_000228123; TURN\_21MC100\_000542751 is attached hereto as Exhibit 19.

20. A true and accurate copy of the Staten Island University Medical Center record related to Vincent Briganti bates stamped BrigantiVincent101059\_000511 through 000512 and BrigantiVincent101059\_001001 is attached hereto as Exhibit 20.

21. A true and accurate copy of the Consolidated Edison Employment Records related to Richard Calderon bates stamped 06cv10267-000336 through 000341 is attached hereto as Exhibit 21.

22. A true and accurate copy of the Core Discovery Response of Richard Calderon dated 6/9/2008 is attached hereto as Exhibit 22.

23. A true and accurate copy of the Court Database Response of Richard Calderon is attached hereto as Exhibit 23.

24. A true and accurate copy of the Deposition Transcripts of Richard Calderon dated 10/1/2009, 11/4/2009 and 11/24/2009 is attached hereto as Exhibit 24.

25. A true and accurate copy of the First Set of Supplemental and Amended Objections and Responses to the First set of Interrogatories Directed to Richard Calderon dated 8/11/2009 is attached hereto as Exhibit 25.

26. A true and accurate copy of the Core Discovery Response of James Cantore dated 6/9/2008 is attached hereto as Exhibit 26.

27. A true and accurate copy of the Deposition Transcript of James Cantore dated 1/28/2010 is attached hereto as Exhibit 27.

28. A true and accurate copy of Dr. Peter Gottlieb's record related to James Cantore bates stamped Gottlieb Subp. Resp\_000001 through 000004 is attached hereto as Exhibit 28.

29. A true and accurate copy of the Dr. Peter Gottlieb Record related to James Cantore bates stamped CantoreJames042763\_000186 is attached hereto as Exhibit 29.

30. A true and accurate copy of Bovis Lend Lease Timesheets for Calogero Caruso bates stamped BOVIS\_21MC100\_001075756 through 001075774 is attached hereto as Exhibit 30.

31. A true and accurate copy of the Deposition Transcripts of Calogero Caruso dated 12/1/2009 and 1/7/2010 is attached hereto as Exhibit 31.

32. A true and accurate copy of the Court Database Response of Laron Casey is attached hereto as Exhibit 32.

33. A true and accurate copy of the Deposition Transcripts of Laron Casey dated 9/17/09 and 11/4/09 is attached hereto as Exhibit 33.

34. A true and accurate copy of Dr. Ankobiah's (Rosedale Medical) Record related to Laron Casey bates stamped CaseyLaron030171\_000064, 247-248, 712-713 is attached hereto as Exhibit 34.

35. A true and accurate copy of Dr. Martha Pilchman's records dated 8/16/2005 bates stamped CaseyLaron030171\_000044 – 45 is attached hereto as Exhibit 35.

36. A true and accurate copy of the First Amended Core Discovery Response of Laron Casey dated 8/22/2008 is attached hereto as Exhibit 36.

37. A true and accurate copy of the First Set of Supplemental and Amended Objections and Responses to the First set of Interrogatories Directed to Laron Casey dated 8/11/2009 is attached hereto as Exhibit 37.

38. A true and accurate copy of a Letter from Dr. Bonafede to Dr. Cebelenski regarding Laron Casey dated 12/6/2001 bates stamped CaseyLaron030171\_000013 is attached hereto as Exhibit 38.

39. A true and accurate copy of Long Island Jewish Medical Center Emergency Dept.'s Report dated 11/24/2001 bates stamped CaseyLaron030171\_000092 – 95 is attached hereto as Exhibit 39.

40. A true and accurate copy of Long Island Jewish Medical Center Emergency Dept. Report of Physical Exam dated 11/24/2001 bates stamped CaseyLaron030171\_000100 – 101 is attached hereto as Exhibit 40.

41. A true and accurate copy of a Memo from City of New York Medical Board regarding Examination of Member Service- Laron Casey bates stamped 06CV08890-000001-6 is attached hereto as Exhibit 41.

42. A true and accurate copy of the NYPD Line of Duty Injury Report related to Laron Casey bates stamped CaseyLaron06cv08890\_001711 is attached hereto as Exhibit 42.

43. A true and accurate copy of the NYPD Sick Report related to Laron Casey dated 10/10/2001 bates stamped CaseyLaron030171\_000760 is attached hereto as Exhibit 43.

44. A true and accurate copy of the Plaintiff Produced Physician Notes bates stamped CaseyLaron030171\_000021 is attached hereto as Exhibit 44.

45. A true and accurate copy of the Police Pension Fund Records related to Laron Casey bates stamped CaseyLaron06cv08890\_001353 is attached hereto as Exhibit 45.

46. A true and accurate copy of Rosedale Medical Associates Records bates stamped CaseyLaron06cv08890\_000288 is attached hereto as Exhibit 46.

47. A true and accurate copy of Rosedale Medical's Spirometry Test Results dated 1/9/2002 bates stamped CaseyLaron030171\_000034 is attached hereto as Exhibit 47.

48. A true and accurate copy of an Intentionally Left Blank document is attached hereto as Exhibit 48.

49. A true and accurate copy of the Core Discovery Response of the City of New York regarding Christopher Castro dated 4/7/2008 is attached hereto as Exhibit 49.

50. A true and accurate copy of the Court Database Report Response of Christopher Castro is attached hereto as Exhibit 50.

51. A true and accurate copy of the Departmental Recognition Request dated 2/20/2002 bates stamped CITY\_21MC100\_009094624 is attached hereto as Exhibit 51.

52. A true and accurate copy of the Deposition Transcript of Christopher Castro dated 12/9/2009 is attached hereto as Exhibit 52.

53. A true and accurate copy of the Deposition Transcript of Judith Castro dated 12/9/2009 is attached hereto as Exhibit 53.

54. A true and accurate copy of the NYPD Line of Duty Injury Report regarding Christopher Castro bates stamped CastroChristopher030473\_000063-000064 is attached hereto as Exhibit 54.

55. A true and accurate copy of the Second Supplemental and Amended Objections and Responses to the First Set Of Interrogatories Directed to Christopher Castro dated 11/23/2009 is attached hereto as Exhibit 55.

56. A true and accurate copy of the Third Amended Core Discovery Response of Christopher Castro dated 11/23/2009 is attached hereto as Exhibit 56.

57. A true and accurate copy of the World Trade Center Worker and Volunteer Medical Screening Program Self-Administered Medical Questionnaire completed by Christopher Castro dated 4/14/2005 bates stamped CastroChristopher030473\_000744 is attached hereto as Exhibit 57.

58. A true and accurate copy of the Amended Core Discovery Response to Questions 14, 15 and 16 of James Fahy dated 8/10/2009 is attached hereto as Exhibit 58.

59. A true and accurate copy of the Bordentown Family Medical Center records related to James Fahy bates stamped FahyJames06cv09545\_001197 - 001198 is attached hereto as Exhibit 59.

60. A true and accurate copy of the Camden County Sheriff's Office Sign-In Sheet dated 9/12/2001 bates stamped Camden County Subp. Resp\_000312 is attached hereto as Exhibit 60.

61. A true and accurate copy of the Core Discovery Response of James Fahy dated 6/9/2008 is attached hereto as Exhibit 61.

62. A true and accurate copy of the Court Database Response of James Fahy is attached hereto as Exhibit 62.

63. A true and accurate copy of the Deposition Transcript of Harry Monroe dated 1/8/2010 is attached hereto as Exhibit 63.

64. A true and accurate copy of the Deposition Transcript of Irma Fahy dated 9/25/2009 is attached hereto as Exhibit 64.

65. A true and accurate copy of the Deposition Transcript of Michael McLaughlin dated 1/15/2010 is attached hereto as Exhibit 65.

66. A true and accurate copy of the Deposition Transcript of Thomas Schlichtig dated 1/29/2010 is attached hereto as Exhibit 66.

67. A true and accurate copy of the Deposition Transcript of Timothy Chen dated 11/23/2009 is attached hereto as Exhibit 67.

68. A true and accurate copy of the Deposition Transcripts of James Fahy dated 9/25/2009 and 12/3/2009 is attached hereto as Exhibit 68.

69. A true and accurate copy of the First Set of Supplemental and Amended Objections and Responses to the First set of Interrogatories Directed to James Fahy dated 11/8/2009 is attached hereto as Exhibit 69.

70. A true and accurate copy of the Response of James and Irma Fahy to First Set of Interrogatories directed to Plaintiff James Fahy dated 6/22/2009 is attached hereto as Exhibit 70.

71. A true and accurate copy of the Consolidated Edison Occupational Health Job Fitness Evaluation bates stamped GalvaniRobert070248\_001116 is attached hereto as Exhibit 71.

72. A true and accurate copy of the Consolidated Edison Periodic Medical Questionnaire dated 3/9/2000 bates stamped GalvaniRobert05cv10740\_003393-3396 is attached hereto as Exhibit 72.

73. A true and accurate copy of the Court Database Response of Robert Galvani is attached hereto as Exhibit 73.

74. A true and accurate copy of the Deposition Transcript of Irvin Lassiter dated 1/12/2010 is attached hereto as Exhibit 74.

75. A true and accurate copy of the Deposition Transcripts of Robert Galvani dated 9/30/2009 and 11/9/2009 is attached hereto as Exhibit 75.

76. A true and accurate copy of the Dr. Giuseppe Caruso Records regarding Robert Galvani bates stamped GalvaniRobert05cv10740\_003791 is attached hereto as Exhibit 76.

77. A true and accurate copy of the First Amended Core Discovery Response of Robert Galvani dated 7/22/2008 is attached hereto as Exhibit 77.

78. A true and accurate copy of the First Set of Supplemental and Amended Objections and Responses to the First set of Interrogatories Directed to Robert Galvani dated 6/22/2009 is attached hereto as Exhibit 78.

79. A true and accurate copy of a Letter from Dr. Giuseppe Caruso to Dr. Phillip Noel dated 10/31/2001 bates stamped GalvaniRobert070248\_000132-133 is attached hereto as Exhibit 79.

80. A true and accurate copy of the Island Pulmonary – Dr. Giuseppe Caruso 12/10/2001 Examination Report bates stamped GalvaniRobert070248\_000162 is attached hereto as Exhibit 80.

81. A true and accurate copy of the Transcript of the Examination of Robert Galvani pursuant to 50(h) of the general municipal law dated 3/7/2007 is attached hereto as Exhibit 81.

82. A true and accurate copy of the Deposition Transcripts of Joseph Greco dated 9/22/2009 and 10/5/2009 is attached hereto as Exhibit 82.

83. A true and accurate copy of Dr. Anthony Arcati's records related to Joseph Greco bates stamped GrecoJoseph082868\_000321, GrecoJoseph082868\_000329 and GrecoJoseph082868\_000330 is attached hereto as Exhibit 83.

84. A true and accurate copy of the First Amended Core Discovery Response of Joseph Greco dated 7/9/2008 is attached hereto as Exhibit 84.

85. A true and accurate copy of the First Set of Supplemental and Amended Objections and Responses to the First set of Interrogatories Directed to Joseph Greco dated 6/22/2009 is attached hereto as Exhibit 85.

86. A true and accurate copy of the FISA WTC Over-time Report bates stamped GrecoJoseph05cv1228\_000681 through 000683 is attached hereto as Exhibit 86.

87. A true and accurate copy of the FISA WTC Over-time Report bates stamped GrecoJoseph05cv1228\_000703 through 000705 is attached hereto as Exhibit 87.

88. A true and accurate copy of the NYPD Memo dated 4/24/2007 bates stamped 05cv1228-000001 is attached hereto as Exhibit 88.

89. A true and accurate copy of the Transcript of the Examination of Joseph Greco pursuant to 50(h) of the general municipal law dated 12/19/2005 is attached hereto as Exhibit 89.

90. A true and accurate copy of the World Trade Center Worker and Volunteer Medical Screening Self-Administered Medical Questionnaire completed by Joseph Greco bates stamped Karnick Subp. Resp\_000075 - 000085 is attached hereto as Exhibit 90.

91. A true and accurate copy of the WTC Pay Detail Report bates stamped GrecoJoseph05cv1228\_000684 through 000685 is attached hereto as Exhibit 91.

92. A true and accurate copy of the Core Discovery Response of the City of New York related to Raymond Hauber dated 4/7/2008 is attached hereto as Exhibit 92.

93. A true and accurate copy of the Core Discovery Response of Raymond Hauber dated 9/12/2008 is attached hereto as Exhibit 93.

94. A true and accurate copy of the Court Database Response of Raymond Hauber is attached hereto as Exhibit 94.

95. A true and accurate copy of the Hauber Fit Test Report bates stamped CITY\_21MC100\_003934772 is attached hereto as Exhibit 95.

96. A true and accurate copy of the Raymond Hauber's FDNY Notice of Participation in the World Trade Center Rescue, Recovery or Clean Up Operations bates stamped CITY\_21MC100\_006204842 – 006204845 is attached hereto as Exhibit 96.

97. A true and accurate copy of the Response to Document Demand of Raymond Hauber including Tax Returns for the years 1999 through 2007 marked as exhibits B-K is attached hereto as Exhibit 97.

98. A true and accurate copy of the Transcript of the Examination of Raymond Hauber pursuant to 50(h) of the general municipal law dated 1/20/2006 is attached hereto as Exhibit 98.

99. A true and accurate copy of the Core Discovery Response of Frank Malone dated 9/2/2008 is attached hereto as Exhibit 99.

100. A true and accurate copy of the Deposition Transcripts of Frank Malone dated 9/10/2009 and 9/17/2009 is attached hereto as Exhibit 100.

101. A true and accurate copy of the First Set of Supplemental and Amended Objections and Responses to the First set of Interrogatories Directed to Frank Malone dated 6/12/2009 is attached hereto as Exhibit 101.

102. A true and accurate copy of the Core Discovery Response of John Quinn dated 2/13/2009 is attached hereto as Exhibit 102.

103. A true and accurate copy of the Deposition Transcript of John Quinn dated 11/2/2009 is attached hereto as Exhibit 103.

104. A true and accurate copy of Plaintiff produced Employee Pay Statements for John Quinn is attached hereto as Exhibit 104.

105. A true and accurate copy of the Supplemental Objections and Responses to Defendants' First Set of Interrogatories Directed to John Quinn dated 9/21/2009 is attached hereto as Exhibit 105.

106. A true and accurate copy of the FDNY Medical History Report dated 11/09/2007 bates stamped QuinnJohn102363\_000644 is attached hereto as Exhibit 106.

107. A true and accurate copy of the Amended Core Discovery Response to Questions 11, 12(A), and 12(B) of Micheal Shanahan dated 8/20/2009 is attached hereto as Exhibit 107.

108. A true and accurate copy of the First Amended Core Discovery Response of Michael Shanahan 7/9/2008 is attached hereto as Exhibit 108.

109. A true and accurate copy of the First Set of Supplemental and Amended Objections and Responses to the First set of Interrogatories Directed to Michael Shanahan dated 9/14/2009 is attached hereto as Exhibit 109.

110. A true and accurate copy of the Deposition Transcript of Michael Shanahan dated 10/23/2009 is attached hereto as Exhibit 110.

111. A true and accurate copy of the Court Database Response of Dawn Sorrento is attached hereto as Exhibit 111.

112. A true and accurate copy of the Deposition Transcripts of Dawn Sorrento dated 11/23/2009 and 12/21/2009 is attached hereto as Exhibit 112.

113. A true and accurate copy of the First Amended Core Discovery Response of Dawn Sorrento dated 10/6/2008 is attached hereto as Exhibit 113.

114. A true and accurate copy of the Transcript of the Examination of Dawn Sorrento pursuant to 50(h) of the general municipal law dated 3/26/2006 is attached hereto as Exhibit 114.

115. A true and accurate copy of the Consolidated Edison Daily Crew Activity Reports – DARS, exhibit 29 to the Deposition of David Wells is attached hereto as Exhibit 115.

116. A true and accurate copy of the Consolidated Edison Environmental Operations-Queens Week Ending Reports dated 9/15/2001 through 12/15/2001 is attached hereto as Exhibit 116.

117. A true and accurate copy of Exhibit 20 to Deposition of David Wells, Consolidated Edison Respirator Training/Fit Testing/Size Check Documents related to David Wells dated 9/6/2001 bates stamped WellsDavid05cv01335\_001153 is attached hereto as Exhibit 117.

118. A true and accurate copy of the Deposition Transcripts of David Wells dated 12/11/2009 and 1/20/2010 is attached hereto as Exhibit 118.

119. A true and accurate copy of the First Amended Core Discovery Response of David Wells dated 7/22/2008 is attached hereto as Exhibit 119.

120. A true and accurate copy of the First Set of Supplemental and Amended Objections and Responses to the First Set of Interrogatories Directed to David Wells dated 9/14/2009 is attached hereto as Exhibit 120.

121. A true and accurate copy of the 50h Demand Letter dated 9/9/2009 from Patton Boggs LLP to Worby regarding 50h Examinations on 10/19/2009 is attached hereto as Exhibit 121.

122. A true and accurate copy of the 50h Demand Letter from Corporation Counsel to Worby dated 1/25/2007 is attached hereto as Exhibit 122.

123. A true and accurate copy of the 50h Demand Letter from Patton Boggs LLP to Worby dated 1/15/2010 is attached hereto as Exhibit 123.

124. A true and accurate copy of the 50h Demand Letter from Patton Boggs LLP to Worby dated 7/6/2009 for 50h Examinations on 8/10/2009 is attached hereto as Exhibit 124.

125. A true and accurate copy of the 50h Demand letter from Patton Boggs LLP to Worby dated 8/3/2009 regarding September 50h schedule is attached hereto as Exhibit 125.

126. A true and accurate copy of A Russo Wrecking Core Discovery Responses dated 3/7/2008 is attached hereto as Exhibit 126.

127. A true and accurate copy of the A. Russo Wrecking Court Database Report is attached hereto as Exhibit 127.

128. A true and accurate copy of the Abarca Summons with Notice dated 7/11/2005 is attached hereto as Exhibit 128.

129. A true and accurate copy of the Abarno Summons with Notice dated 3/30/2006 is attached hereto as Exhibit 129.

130. A true and accurate copy of the Abbate Summons with Notice dated 5/16/2005 is attached hereto as Exhibit 130.

131. A true and accurate copy of the Affidavit of Kristin M. Helmers dated 6/19/2009 with Exhibits is attached hereto as Exhibit 131.

132. A true and accurate copy of the Agnelli Summons with Notice dated 12/22/2005 is attached hereto as Exhibit 132.

133. A true and accurate copy of the Amec Construction Management Inc. and Amec Earth & Environmental Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 133.

134. A true and accurate copy of the Amec Construction Management Inc. Court Database Report is attached hereto as Exhibit 134.

135. A true and accurate copy of the Amec Daily Reports dated 11/22/2001, 12/11/2001 and 12/19/2001 bates number AMEC\_21MC100\_000043965; AMEC\_21MC100\_000043941 and AMEC\_21MC100\_00043957 is attached hereto as Exhibit 135.

136. A true and accurate copy of the Amec Earth & Environmental Court Database Report is attached hereto as Exhibit 136.

137. A true and accurate copy of the Anthony Cortese Core Discovery Responses dated 3/7/2008 is attached hereto as Exhibit 137.

138. A true and accurate copy of the Atlantic Heydt Corp. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 138.

139. A true and accurate copy of the Atlantic Heydt Corporation Court Database Report is attached hereto as Exhibit 139.

140. A true and accurate copy of the Berkel & Company Contractors, Inc. Core Discovery Responses dated 3/7/2008 is attached hereto as Exhibit 140.

141. A true and accurate copy of the Berkel & Company Contractors, Inc. Court Database Report is attached hereto as Exhibit 141.

142. A true and accurate copy of the Big Apple Wrecking Core Discovery Response 3/7/2008 is attached hereto as Exhibit 142.

143. A true and accurate copy of the Big Apple Wrecking Court Database Report is attached hereto as Exhibit 143.

144. A true and accurate copy of the Bovis Lend Lease LMB, Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 144.

145. A true and accurate copy of the Bovis Lend Lease LMB, Inc. Court Database Report is attached hereto as Exhibit 145.

146. A true and accurate copy of the Breeze Core Discovery Responses dated 3/7/2008 is attached hereto as Exhibit 146.

147. A true and accurate copy of the Brer-Four Transportation Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 147.

148. A true and accurate copy of the Brer-Four Transportation Court Database Report is attached hereto as Exhibit 148.

149. A true and accurate copy of the Buro Happold Consulting Engineers, PC Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 149.

150. A true and accurate copy of the Buro Happold Consulting Engineers, PC Court Database Report is attached hereto as Exhibit 150.

151. A true and accurate copy of the C.B. Contracting Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 151.

152. A true and accurate copy of the C.B. Contracting Corp. Court Database Report is attached hereto as Exhibit 152.

153. A true and accurate copy of the Canron Construction Corp. Core Discovery Response 3/7/2008 is attached hereto as Exhibit 153.

154. A true and accurate copy of the Canron Construction Corp. Court Database Report is attached hereto as Exhibit 154.

155. A true and accurate copy of the NYPD Line of Duty Injury Report related to Laron Casey dated 10/10/2001 bates stamped CaseyLaron06cv08890\_001711 is attached hereto as Exhibit 155.

156. A true and accurate copy of the Component Assembly Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 156.

157. A true and accurate copy of the Component Assembly Systems, Inc. Court Database Report is attached hereto as Exhibit 157.

158. A true and accurate copy of the Cord Contracting Co., Inc. Court Database Report is attached hereto as Exhibit 158.

159. A true and accurate copy of the Cord Contracting Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 159.

160. A true and accurate copy of the Dakota Demo Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 160.

161. A true and accurate copy of the Dakota Demo Court Database Report is attached hereto as Exhibit 161.

162. A true and accurate copy of the DDC World Trade Center Emergency Project Environmental, Safety and Health Plan dated 2/7/2002 bates stamped PA-CMO3-0000178 through 000453 is attached hereto as Exhibit 162.

163. A true and accurate copy of the Debris Removal Insurance Program Executive Summary bates stamped FEMA-DC00004560-61 is attached hereto as Exhibit 163.

164. A true and accurate copy of the Declaration of Defendant Amec Construction Management Inc. Pursuant to Section III (A) (3) of Case Management Order #3 dated 3/17/2005 is attached hereto as Exhibit 164.

165. A true and accurate copy of the Declaration of Defendant Bovis Lend Lease Pursuant to Section III (A) (3) of Case Management Order #3 dated 3/17/2005 is attached hereto as Exhibit 165.

166. A true and accurate copy of the Declaration of Defendant Tully Construction Co. Inc. Pursuant to Section III (A) (3) of Case Management Order #3 dated 3/17/2005 is attached hereto as Exhibit 166.

167. A true and accurate copy of the Declaration of Defendant Turner Construction Company Pursuant to Section III (A) (3) of Case Management Order #3 dated 3/17/2005 is attached hereto as Exhibit 167.

168. A true and accurate copy of the Departmental Recognition Request for Sgt. James McMonagle (undated) bates stamped CITY\_21MC100\_003119006-907 is attached hereto as Exhibit 168.

169. A true and accurate copy of the Deposition Transcript of Andrew Pontecorvo dated 7/17/2009 is attached hereto as Exhibit 169.

170. A true and accurate copy of the Deposition Transcript of Angelo Sisca dated 9/17/2009 is attached hereto as Exhibit 170.

171. A true and accurate copy of the Deposition Transcript of Ann Marie Russo dated 10/1/2009 is attached hereto as Exhibit 171.

172. A true and accurate copy of the Deposition Transcript of Anthony Arcati dated 11/25/2009 is attached hereto as Exhibit 172.

173. A true and accurate copy of the Deposition Transcript of Anthony Martucci dated 9/28/2009 is attached hereto as Exhibit 173.

174. A true and accurate copy of the Deposition Transcript of Anthony Smeragliuolo dated 12/30/01 is attached hereto as Exhibit 174.

175. A true and accurate copy of the Deposition Transcript of Bruce Sprague dated 12/7/2005 is attached hereto as Exhibit 175.

176. A true and accurate copy of the Deposition Transcript of Carol Burt dated 10/27/2009 is attached hereto as Exhibit 176.

177. A true and accurate copy of the Deposition Transcript of Charles Schriefer dated 12/2/2009 is attached hereto as Exhibit 177.

178. A true and accurate copy of the Deposition Transcript of Craig Schwitter dated 10/19/2009 is attached hereto as Exhibit 178.

179. A true and accurate copy of the Deposition Transcript of Daiena D'Arpino dated 7/21/2009 is attached hereto as Exhibit 179.

180. A true and accurate copy of the Deposition Transcript of Daniel Cuoco dated 10/23/2009 is attached hereto as Exhibit 180.

181. A true and accurate copy of the Deposition Transcript of Dave Collins dated 12/11/2009 is attached hereto as Exhibit 181.

182. A true and accurate copy of the Deposition Transcript of David Weatherer dated 10/6/2009 is attached hereto as Exhibit 182.

183. A true and accurate copy of the Deposition Transcript of Donna Tedeschi dated 10/22/2009 is attached hereto as Exhibit 183.

184. A true and accurate copy of the Deposition Transcript of Dr. Lawrence Langan dated 10/27/2009 is attached hereto as Exhibit 184.

185. A true and accurate copy of the Deposition Transcript of Duncan Cox dated 10/9/2009 is attached hereto as Exhibit 185.

186. A true and accurate copy of the Deposition Transcript of Elizabeth Crozzoli dated 9/17/2009 is attached hereto as Exhibit 186.

187. A true and accurate copy of the Deposition Transcript of Eugene Camali dated 10/16/2009 is attached hereto as Exhibit 187.

188. A true and accurate copy of the Deposition Transcript of Fernando Grimaldi dated 12/15/2009 is attached hereto as Exhibit 188.

189. A true and accurate copy of the Deposition Transcript of Frank Cruthers dated 12/15/2009 is attached hereto as Exhibit 189.

190. A true and accurate copy of the Deposition Transcript of Frank DiSalvo dated 9/23/2009 is attached hereto as Exhibit 190.

191. A true and accurate copy of the Deposition Transcript of Frank Gesulado dated 11/20/2009 is attached hereto as Exhibit 191.

192. A true and accurate copy of the Deposition Transcript of Fred Roofing Contraermeier dated 9/16/2009 is attached hereto as Exhibit 192.

193. A true and accurate copy of the Deposition Transcript of Grace Mazzocchi Turnbaugh 11/19/2009 is attached hereto as Exhibit 193.

194. A true and accurate copy of the Deposition Transcript of Harvey Anikstein dated 10/14/2009 is attached hereto as Exhibit 194.

195. A true and accurate copy of the Deposition Transcript of Isaac Boyarsky dated 7/27/2009 is attached hereto as Exhibit 195.

196. A true and accurate copy of the Deposition Transcript of Jack Mesagno dated 11/12/2009 is attached hereto as Exhibit 196.

197. A true and accurate copy of the Deposition Transcript of James Abadie dated 7/15/2005 is attached hereto as Exhibit 197.

198. A true and accurate copy of the Deposition Transcript of James Albach dated 11/5/2009 is attached hereto as Exhibit 198.

199. A true and accurate copy of the Deposition Transcript of James BiFulco dated 10/2/2009 is attached hereto as Exhibit 199.

200. A true and accurate copy of the Deposition Transcript of James Lomma dated 10/19/2009 is attached hereto as Exhibit 200.

201. A true and accurate copy of the Deposition Transcript of James Luongo dated 9/21/2005 is attached hereto as Exhibit 201.

202. A true and accurate copy of the Deposition Transcript of Jan Szumanski dated 12/9/2009 is attached hereto as Exhibit 202.

203. A true and accurate copy of the Deposition Transcript of John Breslin dated 10/19/2009 is attached hereto as Exhibit 203.

204. A true and accurate copy of the Deposition Transcript of John Foley dated 1/12/2010 is attached hereto as Exhibit 204.

205. A true and accurate copy of the Deposition Transcript of John McCarthy dated 10/1/2009 is attached hereto as Exhibit 205.

206. A true and accurate copy of the Deposition Transcript of John Norman dated 9/21/2009 is attached hereto as Exhibit 206.

207. A true and accurate copy of the Deposition Transcript of John Yannuzzi dated 11/19/2009 is attached hereto as Exhibit 207.

208. A true and accurate copy of the Deposition Transcript of Joseph A. Whelan dated 10/5/2009 is attached hereto as Exhibit 208.

209. A true and accurate copy of the Deposition Transcript of Joseph Raguso dated 9/29/2009 is attached hereto as Exhibit 209.

210. A true and accurate copy of the Deposition Transcript of Joseph Sullo dated 11/19/2009 is attached hereto as Exhibit 210.

211. A true and accurate copy of the Deposition Transcript of Joseph Tortorella dated 7/29/2009 is attached hereto as Exhibit 211.

212. A true and accurate copy of the Deposition Transcript of Mark Trojan dated 8/4/2009 is attached hereto as Exhibit 212.

213. A true and accurate copy of the Deposition Transcript of Michael Bielawa dated 11/13/2009 is attached hereto as Exhibit 213.

214. A true and accurate copy of the Deposition Transcript of Michael Burton dated 12/8/2005 is attached hereto as Exhibit 214.

215. A true and accurate copy of the Deposition Transcript of Michael Guilfoyle dated 10/6/2009 is attached hereto as Exhibit 215.

216. A true and accurate copy of the Deposition Transcript of Michael Steinman dated 11/20/2009 is attached hereto as Exhibit 216.

217. A true and accurate copy of the Deposition Transcript of Mindy Hersh dated 1/13/2010 is attached hereto as Exhibit 217.

218. A true and accurate copy of the Deposition Transcript of Neil Greenblatt dated 7/28/2009 is attached hereto as Exhibit 218.

219. A true and accurate copy of the Deposition Transcript of Ovis Wohl dated 11/17/2009 is attached hereto as Exhibit 219.

220. A true and accurate copy of the Deposition Transcript of Patrick Muldoon dated 11/3/2005 is attached hereto as Exhibit 220.

221. A true and accurate copy of the Deposition Transcript of Peter Hayden dated 9/19/2005 is attached hereto as Exhibit 221.

222. A true and accurate copy of the Deposition Transcript of Peter Scalamandre dated 10/14/2009 is attached hereto as Exhibit 222.

223. A true and accurate copy of the Deposition Transcript of Ramon Gilsanz dated 7/31/2009 is attached hereto as Exhibit 223.

224. A true and accurate copy of the Deposition Transcript of Richard Garlock dated 6/4/2009 is attached hereto as Exhibit 224.

225. A true and accurate copy of the Deposition Transcript of Richard Telesmanich dated 11/12/2009 is attached hereto as Exhibit 225.

226. A true and accurate copy of the Deposition Transcript of Richard Zottola dated 7/21/2009 is attached hereto as Exhibit 226.

227. A true and accurate copy of the Deposition Transcript of Robert Gerosa dated 10/30/2009 is attached hereto as Exhibit 227.

228. A true and accurate copy of the Deposition Transcript of Robert Hutchinson dated 12/16/2009 is attached hereto as Exhibit 228.

229. A true and accurate copy of the Deposition Transcript of Ronald Spadafora dated 11/10/2009 is attached hereto as Exhibit 229.

230. A true and accurate copy of the Deposition Transcript of Ronald Stallone dated 10/15/2009 is attached hereto as Exhibit 230.

231. A true and accurate copy of the Deposition Transcript of Salvatore Carucci dated 11/18/2009 is attached hereto as Exhibit 231.

232. A true and accurate copy of the Deposition Transcript of Salvatore Cassano dated 9/30/2005 is attached hereto as Exhibit 232.

233. A true and accurate copy of the Deposition Transcript of Sam Benson dated 11/8/2005 is attached hereto as Exhibit 233.

234. A true and accurate copy of the Deposition Transcript of Stephen Cioffi dated 12/21/2009 is attached hereto as Exhibit 234.

235. A true and accurate copy of the Deposition Transcript of Sylvester Celebrini dated 10/21/2009 is attached hereto as Exhibit 235.

236. A true and accurate copy of the Deposition Transcript of Thomas Beggs dated 10/20/2009 is attached hereto as Exhibit 236.

237. A true and accurate copy of the Deposition Transcript of Thomas Langan dated 11/10/2009 is attached hereto as Exhibit 237.

238. A true and accurate copy of the Deposition Transcript of Thomas Olesczuk dated 10/5/2009 is attached hereto as Exhibit 238.

239. A true and accurate copy of the Deposition Transcript of Vincent Briganti in Briganti vs. St. Vincent's Medical Center and Hsien Kwang Liu dated 7/14/2002 is attached hereto as Exhibit 239.

240. A true and accurate copy of the Deposition Transcript of Walter Murray dated 7/29/2005 is attached hereto as Exhibit 240.

241. A true and accurate copy of the Deposition Transcript of William Cote dated 10/20/2009 is attached hereto as Exhibit 241.

242. A true and accurate copy of the Deposition Transcript of William Ryan dated 10/14/2009 is attached hereto as Exhibit 242.

243. A true and accurate copy of the Deposition Transcript of William Sandie dated 11/3/2009 is attached hereto as Exhibit 243.

244. A true and accurate copy of the Deposition Transcripts of Claude Jean-Pierre dated 11/13/2009 is attached hereto as Exhibit 244.

245. A true and accurate copy of the Deposition Transcripts of Scott Kerstetter dated 12/21/2009 is attached hereto as Exhibit 245.

246. A true and accurate copy of the Deposition Transcripts of Scott Malkoff dated 11/17/2009 is attached hereto as Exhibit 246.

247. A true and accurate copy of the Diamond Point Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 247.

248. A true and accurate copy of the Diamond Point Court Database Report is attached hereto as Exhibit 248.

249. A true and accurate copy of the Diversified Carting Core Discovery Response dated 5/7/2008 is attached hereto as Exhibit 249.

250. A true and accurate copy of the Diversified Carting Court Database Report is attached hereto as Exhibit 250.

251. A true and accurate copy of the DMT Enterprise, Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 251.

252. A true and accurate copy of the DMT Enterprise, Inc. Court Database Report is attached hereto as Exhibit 252.

253. A true and accurate copy of the Draft Summary Timeline of EHHS at WTC 9/16/2001-10/30/2001 bates stamped CITY\_21MC100\_011073439 is attached hereto as Exhibit 253.

254. A true and accurate copy of the Draft WTC Exposure Monitoring Report 9/20/2001 bates stamped CITY\_21MC100\_011098694 is attached hereto as Exhibit 254.

255. A true and accurate copy of the Eagle One Roofing Contractors, Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 255.

256. A true and accurate copy of the Eagle One Roofing Contractors, Inc. Court Database Report is attached hereto as Exhibit 256.

257. A true and accurate copy of the EHS Night Shift Report-bates stamped BOVCM3\_000001406-1412 is attached hereto as Exhibit 257.

258. A true and accurate copy of the EJ Davies Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 258.

259. A true and accurate copy of the Email dated 10/15/2009 from Napoli Bern adjourning 10/19/2009 50h hearings is attached hereto as Exhibit 259.

260. A true and accurate copy of the Email from Napoli Bern dated 1/26/10 to Patton Boggs LLP adjourning 1/28/10 50h hearings is attached hereto as Exhibit 260.

261. A true and accurate copy of the Email from Napoli Bern dated 1/29/10 to Patton Boggs LLP adjourning 2/2/10 50h hearings is attached hereto as Exhibit 261.

262. A true and accurate copy of the Email from Napoli Bern to Patton Boggs LLP dated 8/6/2009 adjourning 8/10/09 50h hearings is attached hereto as Exhibit 262.

263. A true and accurate copy of the En-Tech Corporation Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 263.

264. A true and accurate copy of the En-Tech Corporation Court Database Report is attached hereto as Exhibit 264.

265. A true and accurate copy of the Ewell E. Finley, P.C. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 265.

266. A true and accurate copy of the Ewell E. Finley, P.C. Court Database Report is attached hereto as Exhibit 266.

267. A true and accurate copy of the Executive Medical Services, P.C. First Amended Core Discovery Response dated 6/7/2009 is attached hereto as Exhibit 267.

268. A true and accurate copy of the Executive Medical Services, P.C. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 268.

269. A true and accurate copy of the Executive Medical Services, P.C. Court Database Report is attached hereto as Exhibit 269.

270. A true and accurate copy of the FEMA List of WTC Contractors bates stamped FEMA\_NY00086369-86373 is attached hereto as Exhibit 270.

271. A true and accurate copy of the Fleet Trucking Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 271.

272. A true and accurate copy of the Francis A. Lee Company Court Database Report is attached hereto as Exhibit 272.

273. A true and accurate copy of the Francis A. Lee Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 273.

274. A true and accurate copy of the FTI Trucking Court Database Report is attached hereto as Exhibit 274.

275. A true and accurate copy of the General Administrative Notice regarding PPE dated 9/24/2001 bates stamped CITY\_21MC100\_011342312 is attached hereto as Exhibit 275.

276. A true and accurate copy of the General Administrative Notice regarding PPE dated 9/25/2001 bates stamped CITY\_21MC100\_009048709 is attached hereto as Exhibit 276.

277. A true and accurate copy of the Gilsanz Murray Steficel, LLP Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 277.

278. A true and accurate copy of the Gilsanz Murray Steficek, LLP Court Database Report is attached hereto as Exhibit 278.

279. A true and accurate copy of the Goldstein Associates Consulting Engineers PC Court Database Report is attached hereto as Exhibit 279.

280. A true and accurate copy of the Goldstein Associates Consulting Engineers PC Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 280.

281. A true and accurate copy of the Hallen Welding Services, Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 281.

282. A true and accurate copy of the Hallen Welding Services, Inc. Court Database Report is attached hereto as Exhibit 282.

283. A true and accurate copy of the Hearing Transcript dated 11/16/2007 is attached hereto as Exhibit 283.

284. A true and accurate copy of the Hearing Transcript dated 5/29/2008 is attached hereto as Exhibit 284.

285. A true and accurate copy of the Hearing Transcript dated 7/28/2009 is attached hereto as Exhibit 285.

286. A true and accurate copy of the HP Environmental, Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 286.

287. A true and accurate copy of the HP Environmental, Inc. Court Database Report is attached hereto as Exhibit 287.

288. A true and accurate copy of the Hudson Meridian Construction Group LLC Court Database Report is attached hereto as Exhibit 288.

289. A true and accurate copy of the Hudson Meridian Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 289.

290. A true and accurate copy of the JP Equipment Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 290.

291. A true and accurate copy of the JP Equipment Court Database Report is attached hereto as Exhibit 291.

292. A true and accurate copy of the La Strada General Contracting Corp. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 292.

293. A true and accurate copy of the La Strada General Contracting Corp. Court Database Report is attached hereto as Exhibit 293.

294. A true and accurate copy of the Laquila Construction, Inc. Court Database Report is attached hereto as Exhibit 294.

295. A true and accurate copy of the Leslie E. Robertson Associates RLLP Amended Core Discovery Response dated 4/7/2008 is attached hereto as Exhibit 295.

296. A true and accurate copy of the Leslie E. Robertson Associates RLLP Court Database Report is attached hereto as Exhibit 296.

297. A true and accurate copy of the Leslie E. Robertson Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 297.

298. A true and accurate copy of the Letter dated 1/27/2009 to Napoli Bern sending March 2009 50h schedule is attached hereto as Exhibit 298.

299. A true and accurate copy of the Letter dated 3/13/2007 from Napoli Bern to Patton Boggs LLP adjourning 50h hearings per stay is attached hereto as Exhibit 299.

300. A true and accurate copy of the Letter dated 6/21/2002 from Yannuzzi to Phillips & Jordan regarding Proposal to Bag Debris Processing is attached hereto as Exhibit 300.

301. A true and accurate copy of the Liberty Mutual Insurance Company Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 301.

302. A true and accurate copy of the Liberty Mutual Insurance Company Court Database Report is attached hereto as Exhibit 302.

303. A true and accurate copy of the Lockwood Kessler & Bartlett, Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 303.

304. A true and accurate copy of the Lockwood Kessler & Bartlett, Inc. Court Database Report is attached hereto as Exhibit 304.

305. A true and accurate copy of the Lucius Pitkin, Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 305.

306. A true and accurate copy of the Lucius Pitkin, Inc. Court Database Report is attached hereto as Exhibit 306.

307. A true and accurate copy of the Manafort Brothers Incorporated Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 307.

308. A true and accurate copy of the Manafort Brothers Incorporated Court Database Report is attached hereto as Exhibit 308.

309. A true and accurate copy of the Mazzocchi Wrecking, Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 309.

310. A true and accurate copy of the Mazzocchi Wrecking, Inc. Court Database Report is attached hereto as Exhibit 310.

311. A true and accurate copy of the McClean v. Tully Order 20172/2002 dated 2/24/2004 is attached hereto as Exhibit 311.

312. A true and accurate copy of a Memo from Operations Unit to Traffic Control Division dated 10/31/2001 bates stamped CITY\_21MC100\_010244915-4916 is attached hereto as Exhibit 312.

313. A true and accurate copy of the Moretrench American Corp. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 313.

314. A true and accurate copy of the MRA Engineering P.C. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 314.

315. A true and accurate copy of the MRA Engineering P.C. Court Database Report is attached hereto as Exhibit 315.

316. A true and accurate copy of the Mueser Rutledge Consulting Engineers Court Database Report is attached hereto as Exhibit 316.

317. A true and accurate copy of the Mueser Rutledge Consulting Engineers Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 317.

318. A true and accurate copy of the Nacirema Industries Inc. Core Discovery Response dated 6/7/2008 is attached hereto as Exhibit 318.

319. A true and accurate copy of the Nacirema Industries Inc. Court Database Report is attached hereto as Exhibit 319.

320. A true and accurate copy of the New York Crane & Equipment Corp. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 320.

321. A true and accurate copy of the New York Crane & Equipment Corp. Court Database Report is attached hereto as Exhibit 321.

322. A true and accurate copy of the Nicholson Construction Company Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 322.

323. A true and accurate copy of the Nicholson Construction Company Court Database Report is attached hereto as Exhibit 323.

324. A true and accurate copy of the Pinnacle Environmental Corp. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 324.

325. A true and accurate copy of the Pinnacle Environmental Corp. Court Database Report is attached hereto as Exhibit 325.

326. A true and accurate copy of the Plaintiffs Responsive Declaration of Facts Pursuant to CMO3 dated 4/6/2005 is attached hereto as Exhibit 326.

327. A true and accurate copy of the Plaza Construction Corp. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 327.

328. A true and accurate copy of the Plaza Construction Corp. Court Database Report is attached hereto as Exhibit 328.

329. A true and accurate copy of the Pro Safety Services Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 329.

330. A true and accurate copy of the Pro Safety Services Inc. Court Database Report is attached hereto as Exhibit 330.

331. A true and accurate copy of the PT&L Contracting Corp. Core Discovery Response dated 6/7/2008 is attached hereto as Exhibit 331.

332. A true and accurate copy of the PT&L Contracting Corp. Court Database Report is attached hereto as Exhibit 332.

333. A true and accurate copy of the Robert L. Gerosa, Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 333.

334. A true and accurate copy of the Robert L. Gerosa, Inc. Court Database Report is attached hereto as Exhibit 334.

335. A true and accurate copy of the Robert Silman Associates, PC Core Discovery Response 3/7/2008 is attached hereto as Exhibit 335.

336. A true and accurate copy of the Robert Silman Associates, PC Court Database Report is attached hereto as Exhibit 336.

337. A true and accurate copy of the Rodar Enterprises, Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 337.

338. A true and accurate copy of the Rodar Enterprises, Inc. Court Database Report is attached hereto as Exhibit 338.

339. A true and accurate copy of the Royal GM Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 339.

340. A true and accurate copy of the SAB Trucking, Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 340.

341. A true and accurate copy of the SAB Trucking, Inc. Court Database Report is attached hereto as Exhibit 341.

342. A true and accurate copy of the Safeway Environmental Corp. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 342.

343. A true and accurate copy of the Safeway Environmental Corp. Court Database Report is attached hereto as Exhibit 343.

344. A true and accurate copy of Safeway Environmental Corp. Fifth Core Discovery Response dated 3/7/2009 is attached hereto as Exhibit 344.

345. A true and accurate copy of Safeway Environmental Corp. First Amended Core Discovery Response dated 4/7/2008 is attached hereto as Exhibit 345.

346. A true and accurate copy of Safeway Environmental Corp. Fourth Core Discovery Response dated 12/7/2008 is attached hereto as Exhibit 346.

347. A true and accurate copy of Safeway Environmental Corp. Second Core Discovery Response dated 4/7/2008 is attached hereto as Exhibit 347.

348. A true and accurate copy of Safeway Environmental Corp. Third Core Discovery Response dated 8/7/2008 is attached hereto as Exhibit 348.

349. A true and accurate copy of Semcor Equipment & Manufacturing Corp. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 349.

350. A true and accurate copy of Semcor Equipment & Manufacturing Corp. Court Database Report is attached hereto as Exhibit 350.

351. A true and accurate copy of the Silverite Contracting Corp. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 351.

352. A true and accurate copy of the Silverite Contracting Corp. Court Database Report is attached hereto as Exhibit 352.

353. A true and accurate copy of the Simpson Gumpertz & Heger, Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 353.

354. A true and accurate copy of the Simpson Gumpertz & Heger, Inc. Court Database Report is attached hereto as Exhibit 354.

355. A true and accurate copy of the Skanska Koch, Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 355.

356. A true and accurate copy of the Skanska Koch, Inc. Court Database Report is attached hereto as Exhibit 356.

357. A true and accurate copy of the Skidmore Owings & Merrill LLP Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 357.

358. A true and accurate copy of the Skidmore, Owings & Merrill LLP Court Database Report is attached hereto as Exhibit 358.

359. A true and accurate copy of the Statement of Patricia Clark, Regional Administrator - OSHA, before the Subcommittee on National Security, Emerging Threats and International Relations Committee on Government Reform U.S. House of Representatives dated 10/28/2003 is attached hereto as Exhibit 359.

360. A true and accurate copy of the Thornton Tomasetti, Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 360.

361. A true and accurate copy of the Thornton Tomasetti, Inc. Court Database Report is attached hereto as Exhibit 361.

362. A true and accurate copy of the Total Safety Consulting, LLC Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 362.

363. A true and accurate copy of the Total Safety Consulting, LLC Court Database Report is attached hereto as Exhibit 363.

364. A true and accurate copy of the Tucci Equipment Rental Court Database Report is attached hereto as Exhibit 364.

365. A true and accurate copy of the Tully Construction Co. Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 365.

366. A true and accurate copy of the Tully Construction Co. Inc. Court Database Report is attached hereto as Exhibit 366.

367. A true and accurate copy of the Turner Construction Company Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 367.

368. A true and accurate copy of the Turner Construction Company Court Database Report is attached hereto as Exhibit 368.

369. A true and accurate copy of the Turner Plaza Narrative, dated September 11-14, 2001 bates stamped TURCM3-0000001965-1987 is attached hereto as Exhibit 369.

370. A true and accurate copy of the Vollmer Associates LLP Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 370.

371. A true and accurate copy of the Vollmer Associates LLP Court Database Report is attached hereto as Exhibit 371.

372. A true and accurate copy of the Weeks Marine, Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 372.

373. A true and accurate copy of the Weeks Marine, Inc. Court Database Report is attached hereto as Exhibit 373.

374. A true and accurate copy of the Weidlinger Associates PC Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 374.

375. A true and accurate copy of the Weidlinger Associates PC Court Database Report is attached hereto as Exhibit 375.

376. A true and accurate copy of the Wolkow Braker Roofing Corp. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 376.

377. A true and accurate copy of the Wolkow Braker Roofing Corp. Court Database Report is attached hereto as Exhibit 377.

378. A true and accurate copy of the WSP Cantor Seinuk Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 378.

379. A true and accurate copy of the WSP Cantor Seinuk Court Database Report is attached hereto as Exhibit 379.

380. A true and accurate copy of the WTC Recovery Organizational Chart bates stamped BOVIS\_21MC100\_000442556 is attached hereto as Exhibit 380.

381. A true and accurate copy of the Yannuzzi & Sons Cost Proposal dated 6/21/2002 bates stamped ACOE-BALT 00013085 – 00013088 is attached hereto as Exhibit 381.

382. A true and accurate copy of the Yonkers Contracting Company, Inc. Core Discovery Response dated 3/7/2008 is attached hereto as Exhibit 382.

383. A true and accurate copy of the Yonkers Contracting Company, Inc. Court Database Report is attached hereto as Exhibit 383.

384. A true and accurate copy of the Plaintiff Richard Calderon's Amended Core Discovery Response to Questions 11, 12(a) and 12 (b) dated 8/20/2009 is attached hereto as Exhibit 384.

385. A true and accurate copy of the Consolidated Edison - Periodic Medical Questionnaire (Respiratory System) related to Richard Calderon dated 10/30/2001 bates stamped CalderonRichard06cv10267\_00785 - 786 is attached hereto as Exhibit 385

386. A true and accurate copy of the Consolidated Edison - Periodic Medical Questionnaire (Respiratory System) related to Richard Calderon dated 11/3/2005 bates stamped CalderonRichard06cv10267\_00257 - 258 is attached hereto as Exhibit 386.

387. A true and accurate copy of the Montefiore Medical Center - Dr. Kenneth Pinsker - Report related to Richard Calderon dated 8/25/2005 bates stamped CalderonRichard051866\_000005 - 006 is attached hereto as Exhibit 387.

388. A true and accurate copy of the Parkchester Medical Services - Dr. Sangita Shah - Report related to Richard Calderon dated 3/27/2007 bates stamped CalderonRichard051866\_000838 is attached hereto as Exhibit 388.

389. A true and accurate copy of the Departmental Recognition Request for PO Harry Vartan dated 2/7/2002 bates stamped CITY\_21MC100\_009554908-4909 is attached hereto as Exhibit 389.

390. A true and accurate copy of the Departmental Recognition Request for Sgt. Thomas Mikoleski dated 4/15/2002 bates stamped CITY\_21MC100\_009558227-8228 is attached hereto as Exhibit 390.

391. A true and accurate copy of the FDNY ICA Narrative dated 12/21/2001 bates stamped CITY\_21MC100\_003938249 is attached hereto as Exhibit 391.

392. A true and accurate copy of the Attending Physician Statement to Dr. Stephen McCoy related to Robert Galvani bates stamped GalvaniRobert05cv10740\_000418 is attached hereto as Exhibit 392.

393. A true and accurate copy of the Turner Plaza Summary Report (undated) bates stamped AMECCM3-000000298-326 is attached hereto as Exhibit 393.

394. A true and accurate copy of the Deposition Transcript of Patricia Clark dated 11/18/2005 is attached hereto as Exhibit 394.

395. A true and accurate copy of the Deposition Transcript of William Ryan dated 8/2/2005 is attached hereto as Exhibit 395.

396. A true and accurate copy of the Deposition Transcript of Steven R. Touw dated 11/29/2005 is attached hereto as Exhibit 396.

397. A true and accurate copy of the Affidavit of Robert C. Adams dated 4/3/2003 is attached hereto as Exhibit 397.

398. A true and accurate copy of the Deposition Transcript of David Leach dated 9/16/2005 is attached hereto as Exhibit 398.

399. A true and accurate copy of the Amended Core Discovery Responses (Questions 11, 12(A), and 12(B) of Plaintiff Calogero Caruso is attached hereto as Exhibit 399.

400. A true and accurate copy of the Supplemental Objections and Responses to the First Set of Interrogatories Directed to the Administrator of the Estate of Raymond Hauber dated 6/2/2009 is attached hereto as Exhibit 400.

401. A true and accurate copy of the Amended Core Discovery Response to Questions 11, 12(A) and 12(B) of James Cantore dated 8/20/2009 is attached hereto as Exhibit 401.

402. A true and accurate copy of the First Supplemental Objections and Responses to the First set of Interrogatories Directed to Plaintiff Calogero Caruso dated 9/14/2009 is attached hereto as Exhibit 402.

403. A true and accurate copy of the First Supplemental Objections and Responses to the First set of Interrogatories Directed to Plaintiff Richard Ardisson dated 9/14/2009 is attached hereto as Exhibit 403.

404. A true and accurate copy of the Proposal from The Cleveland Group dated 11/3/2001 bates stamped CITYCM3-00062155-62162 is attached hereto as Exhibit 404.

405. A true and accurate copy First Set of Supplemental and Amended Objections and Responses to the First Set of Interrogatories Directed to Plaintiff Dawn Sorrento dated 1/25/2010 is attached hereto as Exhibit 405.

406. A true and accurate copy of the Deposition Transcript of Richard Clancy dated 11/12/2009 is attached hereto as Exhibit 406.

407. A true and accurate copy of the Court Database Response of Joseph Greco is attached hereto as Exhibit 407.

408. A true and accurate copy of the Amended Core Discovery Response to Questions 11, 12(A), and 12(B) of Vincent Briganti dated 8/20/2009 is attached hereto as Exhibit 408.

409. A true and accurate copy of the Amended Core Discovery Response to Questions 11, 12(A), and 12(B) of Robert Galvani dated 8/20/2009 is attached hereto as Exhibit 409.

410. A true and accurate copy of the Amended Core Discovery Response to Questions 11, 12(A), and 12(B) of Richard Ardisson dated 8/20/2009 is attached hereto as Exhibit 410.

411. A true and accurate copy of the Amended Core Discovery Response to Questions 11, 12(A), and 12(B) of Calogero Caruso dated 8/20/2009 is attached hereto as Exhibit 411.

412. A true and accurate copy of the Amended Core Discovery Response to Questions 11, 12(A), and 12(B) of Christopher Castro dated 8/20/2009 is attached hereto as Exhibit 412.

413. A true and accurate copy of the Amended Core Discovery Response to Questions 11, 12(A), and 12(B) of David Wells dated 8/20/2009 is attached hereto as Exhibit 413.

414. A true and accurate copy of the Amended Core Discovery Response to Questions 11, 12(A), and 12(B) of Michael Alleva dated 8/20/2009 is attached hereto as Exhibit 414.

415. A true and accurate copy of the Amended Core Discovery Response to Questions 11, 12(A), and 12(B) of Laron Casey dated 8/20/2009 is attached hereto as Exhibit 415.

416. A true and accurate copy of the Amended Core Discovery Response to Questions 11, 12(A), and 12(B) of Dawn Sorrento dated 8/20/2009 is attached hereto as Exhibit 416.

417. A true and accurate copy of the First Set of Supplemental and Amended Objections and Responses to the First set of Interrogatories Directed to Plaintiff James Cantore dated 8/11/2009 is attached hereto as Exhibit 417.

418. A true and accurate copy of the Plaza Construction Corp. Court Database Report is attached hereto as Exhibit 418.

419. A true and accurate copy of the Deposition Transcript of Harold Valencia dated 01/14/2010 is attached hereto as Exhibit 419.

420. A true and accurate copy of the Records obtained through subpoena directed to Bowler Lawrence related to the medical malpractice action entitled Vincent Briganti vs. Hsien Kwang Liu, MD bates number BowerLawrence Subp. Resp000322-000326 is attached hereto as Exhibit 420.

421. A true and accurate copy of Answers to Interrogatories in Fahy vs. Camden County Sheriff's Dept. dated 9/10/2008 bates stamped FahyJames110759\_001204-001210.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and ability.

Dated: February 16, 2010

/s/ James E. Tyrrell, Jr.  
James E. Tyrrell, Jr. (JT 6837)  
PATTON BOGGS LLP  
1185 Avenue of the Americas  
New York, New York 10036  
(212) 246-5100  
-and-

One Riverfront Plaza, 6th Floor  
Newark, New Jersey 07102  
(973) 848-5600  
*Attorneys for Defendants*

*Exhibits are on file with the Court.*