

IN THE UNITED STATES DISTRICT COURT  
FOR DISTRICT OF MARYLAND

In Re: KBR Burn Pit Litigation

8:09-MD-02083-RWT

**EXHIBIT A TO PLAINTIFFS' FIRST CONSOLIDATED COMPLAINT**

**ALABAMA**

1. Plaintiff Richard Ronald Guilmette, whose address is 306 East Silver Oak Drive, Enterprise, AL 36330, is a U.S. citizen who is a permanent resident of the State of Alabama.

2. Plaintiff Richard Ronald Guilmette was deployed to Afghanistan with the U.S. Army and was stationed at Kandahar from March 31, 2004 to March 31, 2005. For a year, Plaintiff Guilmette lived in a tent close to a burn pit. Prevailing winds blew the thick black smoke and toxic fumes from the burn pit over the camp, and the smoke hung in the tent where Plaintiff Guilmette lived and slept. He noted the constant presence of a horrible smell of burning plastics.

3. As a direct result of exposure to the toxic emissions from the burn pit, Plaintiff Guilmette developed severe chest pain in July 2004. Thereafter, also as a direct result of exposure to the toxic emissions from the burn pit, Plaintiff Guilmette began to experience extreme, uncontrollable diarrhea, which greatly embarrassed and concerned him, and a constant cough with black phlegm and mucus.

4. As a direct result of exposure to toxic emissions from the burn pit, Plaintiff Guilmette has suffered from asthma, sleep apnea, and severe, debilitating migraine headaches. He is dependent upon a breathing machine. He has been treated with

high doses of steroids, but still suffers from low pulmonary function. He has been treated aggressively for his migraine headaches but continues to frequently be incapacitated from them. Plaintiff Guilmette has lost mental functioning and experienced significant memory loss. He is currently on disability for mental impairment. Plaintiff Guilmette's conditions are a direct result of his exposure to the toxic emissions from the burn pits.

5. Plaintiff Peter Manual Reis, whose address is 145 Steel Arm Trail, Ozark, AL 36360-1161, is a U.S. citizen who is a permanent resident of the State of Alabama.

6. Plaintiff Peter Manuel Reis was deployed to Balad Air Base from 2003 to 2009.

7. Plaintiff Reis was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

8. As a direct result of his exposure to the burn pits, Plaintiff Reis suffers medical problems.

9. Plaintiff Beverly Jean Grafton, whose address is 989 County Road 328, Moulton, AL 35650, is a U.S. citizen who is a permanent resident of the State of Alabama.

10. Plaintiff Beverly Grafton was deployed to Balad Air Base with KBR from March 2004 to March 2008.

11. Plaintiff Grafton was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

12. As a direct result of her exposure to the burn pits, Plaintiff Grafton suffers from respiratory problems and a bleeding stomach lining.

13. Plaintiff Justin Shepherd, whose address is 3685 County Road 317, Moulton, AL 35650, is a U.S. citizen who is a permanent resident of the State of Alabama.

14. Plaintiff Justin Shepherd was deployed to Iraq.

15. Plaintiff Shepherd was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

16. As a direct result of his exposure to the burn pits, Plaintiff Shepherd suffers from medical problems.

17. Plaintiff Leon Russell Keith, whose address is 7508 Amanda Circle, Huntsville, AL 35802, is a U.S. citizen who is a permanent resident of the State of Alabama.

18. Plaintiff Leon Russell Keith was a former KBR employee. He was at Balad Air Base from March 2006 to July 2007 and at Basra from April 2008 to June 2009. He worked as a paramedic.

19. Plaintiff Keith was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

20. As a result of his exposure to the burn pits, Plaintiff Keith suffers from pulmonary problems and Parkinson's Disease.

21. In his testimony in front of the Senate Democratic Policy Committee, Plaintiff Keith described the "ten-acre pit" that billowed "acid, dark black smoke", touching "every spot on the base." According to Plaintiff Keith:

There was nothing that KBR would not put in the burn pits. I have never heard of any KBR restrictions on what could be burned in the pit. The color of the smoke would change depending on what was burned. Sometimes the smoke was a yellowish color. But the worst was when the

smoke would be a dark greenish color. On these days, the KBR medical clinic where I worked could expect an increased number of patients, all complaining of burning throats, eyes as well as painful breathing... In my estimation, at least 30 to 40 percent of the total patient traffic at the medical clinic was generated by the poor air quality. *Are Burn Pits in Iraq and Afghanistan Making Our Soldiers Sick? Before the Senate Democratic Policy Committee*, 111<sup>th</sup> Cong. (2009) (statement of Leon Russell Keith, Former KBR Employee).

22. Plaintiff Jamie Nienajadlo, surviving spouse of Danielle Nienajadlo, deceased, is a U.S. citizen who is a permanent resident of the State of Alabama. His address is 228 Blossom Drive, Ozark, AL 36360-1161.

23. Staff Sergeant Nienajadlo was regularly exposed to the toxic emissions from the burn pits in Balad. As a vehicle mechanic, Plaintiff Nienajadlo spent much of her time near the burn pits. When she ran for physical fitness training, she inhaled the burn pits fumes. She described, "We were always covered in ash and dirt. People got bloody noses and headaches." Kelly Kennedy, *Burn Pit Fallout*, Army Times, at [http://www.armytimes.com/news/2008/11/military\\_burnpit\\_complaints\\_111308w/](http://www.armytimes.com/news/2008/11/military_burnpit_complaints_111308w/) (last visited Mar. 4, 2010) As a direct result of her exposure, she suffered weight loss, nausea, diarrhea, fatigue, had difficulty breathing, and was diagnosed with acute myelogenous leukemia on July 26, 2008.

24. Decedent Danielle Nienajadlo died from acute myelogenous leukemia on March 20, 2009.

#### **ALASKA**

25. Plaintiff William G. Brister, Jr., whose address is 12825 Allison Court, Palmer, Alaska, 99645 is a U.S. citizen who is a permanent resident of the State of Alaska.

26. Plaintiff William G. Brister, Jr., was deployed to Iraq by his employer, Defendant KBR, Inc. He lived and worked in Diwaniya for two years, deploying three times. In addition, Mr. Brister was temporarily stationed at Camp Scania, and his final duty station was Camp Bucca.

27. Plaintiff Brister was exposed to hazardous smoke, fumes and ash from the Diwaniya burn pit on a constant basis. The first time he saw the smoke plume and inhaled the ash from the burn pit, Mr. Brister thought that Diwaniya had been hit by a chemical weapon attack. During his stay at Camp Scania, Mr. Briser was housed in a flimsy tent located less than 40 yards from the toxic burn pit.

28. As a direct result of his constant exposure to the hazardous emissions from the burn pits at Diwaniya, Scania and Bucca, Plaintiff Brister experienced burning eyes, sharp pain in his lungs when inhaling and exhaling, lesions inside his nostrils, severe cold symptoms, dizziness, and frequent coughing fits so violent that he lost consciousness. These symptoms have continued unabated to date. He also suffers from chronic upper respiratory congestion and infections, as well as tightness and pressure in his chest.

29. Prior to his deployment, Plaintiff Brister was fit and healthy. After arriving at Diwaniya and since his return from Iraq, Mr. Brister has been suffering from chronic respiratory illness and distress caused by constant inhalation of the hazardous emissions from the Diwaniya burn pit.

30. Plaintiff Henry J. O'Neill, whose address is 3739C Gray Loop, Elmendorf AFB, Alaska 99506, is a U.S. citizen who is a permanent resident of the State of Alaska.

31. Plaintiff Henry J. O'Neill was deployed to Iraq in January 2008 with the 443<sup>rd</sup> Civil Affairs division of the United States Army. While in Iraq, he was the battalion

communications supervisor. Master Sergeant O'Neill was stationed at Camp Speicher, and traveled on monthly supply missions to Balad, where he was also housed. His deployment ended on July 26, 2008.

32. Plaintiff O'Neill endured the smoke, ash and fumes from the burn pit at Camp Speicher on a daily basis. The smell of burning plastic was constant, and the fumes stung his eyes and often made it impossible to complete his work outdoors. During his monthly visits to Balad, Master Sergeant O'Neill was housed in a temporary tent. The emissions from the burn pit at Balad were overwhelming, filling the tent with smoke and choking its inhabitants.

33. As a result of constant exposure to the toxic smoke from the burn pits at Camp Speicher and Balad, Plaintiff O'Neill has suffered from a chronic, debilitating headache syndrome which has escalated to the point that it required hospitalization. In addition, he has experienced significant respiratory difficulty and pain during breathing, which has also required emergency medical attention. Master Sergeant O'Neill has been diagnosed with asthma and sleep apnea, and is dependent upon an inhaler and a breathing machine at night.

34. When Plaintiff O'Neill was deployed, he was healthy. Now, in spite of recently being selected for a promotion by the Army, Plaintiff O'Neill faces a Medical Board review board on the neurological and respiratory ailments he contracted through exposure to toxic smoke from the burn pits at Camp Speicher and Balad. He reasonably fears that he will face mandatory early retirement and the loss of a complete pension as a result. His symptoms continue unabated.

35. Plaintiff Justin Lindell is a U.S. citizen who is a permanent resident of the State of Alaska, residing at 2004 N. Saddle Horse Drive, Wasilla, Alaska 99654.

36. Plaintiff Justin Lindell was deployed to Balad Air Base from July 2007 to June 2008 with the Alaska Army National Guard.

37. Plaintiff Lindell was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

38. As a direct result of his exposure to the burn pits, Plaintiff Lindell suffers from chronic respiratory problems.

#### **ARIZONA**

39. Plaintiff Pablo Berchini is a U.S. citizen who is a permanent resident of the State of Arizona, residing at 8206 W. Clara Lane, Peoria, Arizona 85382.

40. Plaintiff Berchini was deployed to Camp Bucca in Iraq and was exposed to smoke and fumes from a burn pit operated by Defendants. Plaintiff Berchini worked for Air Force prison security. At times, the smoke from the burn pits was so bad that it would engulf the prison towers. As a result, he would have to vacate his guard post. As a result of his exposure to smoke and fumes from the burn pit operated by Defendants, Plaintiff Pablo Berchini suffers from migraine headaches and sinus problems which continue to persist.

41. Plaintiff Susan Clifford is a U.S. citizen who is a permanent resident of the State of Arizona, residing at 15511 W. Central Street, Surprise, Arizona 85374.

42. Plaintiff Susan Clifford was deployed to Iraq from 2003 to 2005. She was in Baghdad and Balad Air Base.

43. Plaintiff Clifford was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

44. As a direct result of her exposure to the burn pits, Plaintiff Clifford had several nodules surgically removed from her lungs. She suffers from bronchitis, pleural fibrosis and severe adult asthma.

45. Plaintiff Sarah Crowley is a U.S. citizen who is a permanent resident of the State of Arizona, residing at 9203 N. 13th Street, Phoenix, Arizona 85020

46. During Plaintiff Sarah Crowley's deployment, she was constantly exposed to the burn pits designed and operated by Defendants.

47. As a direct result of her exposure to the burn pits, Plaintiff Crowley suffers from medical problems.

48. Plaintiff Mark Heimkes is a U.S. citizen who is a permanent resident of the State of Arizona, residing at 18483 W. Capistrano Avenue, Goodyear, Arizona 85338.

49. Plaintiff Mark Heimkes was deployed to Forward Operating Base Marez from September 2008 to January 2009.

50. Plaintiff Heimkes was constantly exposed to the toxins emitted by burn pits designed and operated by Defendants.

51. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff Heimkes suffers from COPD, pulmonary complications, sleeping issues and neurological problems.

52. Plaintiff Brian P. Robinson is a U.S. citizen who is a permanent resident of the State of Arizona, residing at 161st Security Forces Squadron, 3200 E. Old Tower Rd, Phoenix, Arizona 85034.

53. Plaintiff Brian P. Robinson was deployed to Iraq and stationed at Camp Bucca where he was exposed to smoke and fumes from a burn pit operated by Defendants. Plaintiff Brian P. Robinson's work area was adjacent to the burn area and the smoke and fumes also infiltrated into the living and eating areas. The burning was conducted every night and due to the wind direction, Plaintiff Brian P. Robinson's living and working areas were totally blanketed by the smoke. The smoke caused limited visibility in and around the detention camp. The smoke and fumes were so bad that Plaintiff Brian P. Robinson reports that frequently he could not take a normal breath, but could only take exaggerated short breaths.

54. As a result of his exposure to smoke and fumes from the burn pit operated by Defendants, Plaintiff Brian P. Robinson was hospitalized in Iraq for smoke inhalation. Prior to his deployment Plaintiff Brian P. Robinson was in excellent health and was an endurance athlete who competed in long distance bicycle races. Since his exposure to smoke and fumes from the burn pits operated by Defendants, Plaintiff Brian P. Robinson has suffered repeated sinus infections, sore throats, flu-like symptoms and non-stop headaches for a period of twenty months.

55. Plaintiff Emilye Rainwater is a U.S. citizen who is a permanent resident of the State of Arizona, residing at 14559 S. Sumac Drive, Sahuarita, Arizona 85629.

56. Plaintiff Emilye Rainwater was deployed to Iraq as a contracting officer with the DCMA from April 2008 to September 2008 and again from April 2009 to

September 2009. She served at Al Asad, Balad Air Base, the US Embassy in Baghdad and FOB Warhorse.

57. Plaintiff Rainwater was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants and to contaminated water provided by Defendants.

58. As a direct result of her exposure to the burn pits and to contaminated water, Plaintiff Rainwater suffers from acute myeloid leukemia. She has completed three round of chemotherapy and is scheduled for a stem cell transplant.

59. Plaintiff Rainwater is a twin. According to her twin, Mickey Rainwater, "We've always lived in the same cities and traveled to the same countries. The only difference is that I've been a smoker for 25 years and she's been to Iraq. And she has leukemia, and I'm just fine." Matthew D. LaPlante, *Vets: Burn pits are killing us*, The Salt Lake Tribune, at [http://www.sltrib.com/News/ci\\_14182242](http://www.sltrib.com/News/ci_14182242) (last visited Mar. 4, 2010).

## **ARKANSAS**

60. Plaintiff Bill Jack Carlisle, Jr. is a U.S. citizen who is a permanent resident of the State of Arkansas, residing at 15 Warren Street, Cabot, Arkansas 72023.

61. Plaintiff Bill Jack Carlisle, Jr. is a former KBR employee who was in Iraq from December 2006 to July 2008. He worked as a heavy truck driver at Al Asad Air Base, as well as Cedars Base II and TQ B-6.

62. Plaintiff Carlisle was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

63. As a direct result of his exposure to the burn pits, Plaintiff Carlisle suffers from pulmonary complications and hernias.

64. Plaintiff Lee A. Berry, Jr. is a U.S. citizen who is a permanent resident of the State of Arkansas, residing at 1321 Matt Lane, Hensley, Arkansas 72065.

65. Plaintiff Lee A. Berry, Jr., was deployed to Camp Taji from April 2004 to March 2005.

66. Plaintiff Berry was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

67. As a direct result of his exposure to the burn pits, Plaintiff Berry suffers from pulmonary complications, fatigue, intermittent rashes and sleeping issues.

68. Plaintiff Richard A. Green is a U.S. citizen who is a permanent resident of the State of Arkansas, residing at 6808 Gap Point Circle, Sherwood, Arkansas 72120.

69. Plaintiff Richard A. Green was deployed with MPRI and SAIC, first from December 2006 to December 2007 and again from January 2008 to January 2009. He was at several bases, including Camp Liberty and Camp Speicher.

70. Plaintiff Green was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

71. As a direct result of his exposure to the burn pits, Plaintiff Green has suffered from headaches, nose bleeds and shortness of breath.

72. Plaintiff Billy Charles Hamilton is a U.S. citizen who is a permanent resident of the State of Arkansas, residing at 5400 Drexel Avenue, Little Rock, Arkansas 72209.

73. Plaintiff Billy Charles Hamilton was deployed to Camp Taji from October 2003 to March 2005.

74. Plaintiff Hamilton was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

75. As a direct result of his exposure to the burn pits, Plaintiff Hamilton suffers from pulmonary complications, headaches, fatigue, eye problems and sleeping issues.

76. Plaintiff Anthony Edward Roles is a U.S. citizen who is a permanent resident of the State of Arkansas, residing at 19 Wedgewood Drive, Cabot, Arkansas 72023.

77. Plaintiff Anthony Edward Roles was deployed to Balad Air Base from November 2003 to March 2004 with the 332<sup>nd</sup> Expeditionary Air Force Unit as a weather forecaster.

78. Plaintiff Roles was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

79. As a direct result of his exposure to the burn pits designed and operated by Defendants, Plaintiff Roles suffers from headaches, fatigue, tingling in his hands and feet and pulmonary problems. He has also suffered from several bouts of bronchitis, skin rashes, growths in his colon and a heart attack. He has been diagnosed with Essential Thrombocythemia and Polycythemia Vera, and he undergoes blood-letting and takes daily medications for his condition.

80. Plaintiff Bishop Terrell is a U.S. citizen who is a permanent resident of the State of Arkansas, residing at 8005 Woodford Drive, Little Rock, Arkansas 72209.

81. Plaintiff Bishop Terrell was deployed with the U.S. Army to Taji from 2004 to 2006.

82. Plaintiff Terrell was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

83. As a direct result of his exposure to the burn pits, Plaintiff Terrell suffers from medical problems.

### **CALIFORNIA**

84. Plaintiff Michael Auw, whose address is P.O. Box 400571, Hesperia, California, is a U.S. citizen who is a permanent resident of the State of California.

85. Plaintiff Michael Auw, a soldier, was deployed to Iraq and was stationed at Balad Air Base from April 2004 to October 2005. During that time, Plaintiff Auw was a guard in the guard tower located directly above the burn pit. On a regular basis, the guard tower completely filled with thick black smoke. Plaintiff Auw was regularly exposed to large amounts of smoke, haze, fumes and toxic emissions from the burn pits.

86. As a direct result of exposure to toxic emissions from the burn pit, Plaintiff Auw began suffering from a chronic cough and other respiratory symptoms. As a direct result of exposure to toxic emissions from the burn pit, Plaintiff Auw experienced severe neurological damage. Plaintiff Auw is now completely disabled with permanent severe neurological damage that directly resulted from exposure to toxic emissions from the burn pits.

87. Plaintiff Cory Casalegno, whose address is 16046 Turtleback Road, San Diego, California, is a U.S. citizen who is a permanent resident of the State of California.

88. Plaintiff Cory Casalegno was stationed at Balad Air Base in Iraq between August 2004 and December 2004. During that time, he was constantly exposed to toxic

emissions from the burn pit as well as contaminated water provided by Defendants. As a direct result of the exposure to toxic emissions and contaminated water, Plaintiff Casalegno experienced constant cold-like symptoms, chronic coughing, headaches, muscle aches, sleep disturbances and gastrointestinal distress.

89. Plaintiff Dale Bragg, whose address is 811 Peach Court, Apartment Z, El Cajon, California 92021, is a U.S. citizen who is a permanent resident of the State of California.

90. Plaintiff Dale Bragg has been deployed since November 2004. He worked for KBR, Dimensions International and is currently with SAIC. He has been at several bases, including Balad Air Base, Camp Echo, Bagram, Kandahar and Jalalabad. He is currently at Camp Liberty.

91. Plaintiff Bragg was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

92. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff Bragg suffers from medical problems.

93. Plaintiff Dean John Bliablias, whose address is 2055 Jackson Street #1, Santa Clara, California 95050, is a U.S. citizen who is a permanent resident of the State of California.

94. Plaintiff Dean John Bliablias was deployed to Camp Bucca from June 2006 to November 2007.

95. Plaintiff Bliablias was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

96. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff Bliablias suffers from pulmonary complication, migraines and fatigue.

97. Plaintiff Francisco Dones, whose address is 44029 Ruthron Avenue, Lancaster, California 93536 is a U.S. citizen who is a permanent resident of the State of California.

98. Plaintiff Francisco Dones was deployed from February 2004 to August 2004 to Al Asad and Al Taqqadem. He was redeployed from February 2005 to September 2005 to Al Asad.

99. Plaintiff Dones was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants, as well the contaminated water provided by Defendants.

100. As a direct result of his exposure to the burn pits and to the contaminated water, Plaintiff Dones suffers from pulmonary problems, gastrointestinal issues, recurring bouts of bronchitis, chronic headaches, skin rashes, and extreme joint pain.

101. Plaintiff Michael Fitzgerald, whose address is 2899 E. Pryor Drive, Fresno, California 93720, is a U.S. citizen who is a permanent resident of the State of California.

102. Plaintiff Michael Fitzgerald was deployed to Balad Air Base from October 2005 to February 2006.

103. Plaintiff Fitzgerald was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

104. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff Fitzgerald suffers from pulmonary complications and skin problems.

105. Plaintiff Seth Goldstein, whose address is 2209 Fazeli Court, Campbell, California 95008, is a U.S. citizen who is a permanent resident of the State of California.

106. Plaintiff Seth Goldstein was deployed to Balad Air Base from August 2006 to August 2007 and was involved in tactical operations and logistics.

107. Plaintiff Goldstein was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

108. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff Goldstein suffers from chronic bronchitis and asthma.

109. Plaintiff Daniel McNasby, whose address is 623 Reardon Court, Roseville, California 95678, is a U.S. citizen who is a permanent resident of the State of California.

110. Plaintiff Daniel McNasby was deployed from April 2004 to March 2005 to Kal Su and Balad Air Base.

111. Plaintiff McNasby was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

112. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff McNasby suffers from asthma, skin rashes and headaches.

113. Plaintiff Matt Peery, whose address is 9405 Chantilly Lane, Bakersfield, California 93312, is a U.S. citizen who is a permanent resident of the State of California.

114. Plaintiff Matt Peery was deployed to Tallil, Iraq from October 2007 to September 2008.

115. Plaintiff Peery was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

116. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff Peery suffers from a chronic cough and high blood pressure.

117. Plaintiff Rory Schlosberg, whose address is 425 J. Avenue, Coronado, California 92118, is a U.S. citizen who is a permanent resident of the State of California.

118. Plaintiff Rory Schlosberg was deployed to Balad Air Base from May 2005 to September 2005 as a munitions specialist.

119. Plaintiff Schlosberg was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants, as well as the contaminated water provided by Defendants.

120. As a direct result of his exposure to the burn pits and to the contaminated water, Plaintiff Schlosberg suffers from pulmonary complications, asthma, headaches and stomach and chest pain.

121. Plaintiff Jessie Schager, whose address is 3119 Smith Lane, Fortuna, California 95540, is a U.S. citizen who is a permanent resident of the State of California.

122. Plaintiff Jessie Schager was deployed to Balad Air Base from April 2004 to December 2004.

123. Plaintiff Jessie Schager was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

124. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff Schragger suffers from non-Hodgkins Lymphoma.

125. Plaintiff Donald Shepherd, whose address is 1820 Ethan Way, Apartment 3, Sacramento, California 95825, is a U.S. citizen who is a permanent resident of the State of California.

126. Plaintiff Donald Shepherd was deployed to Balad Air Base from February 2004 to May 2005.

127. Plaintiff Shepherd was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

128. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff Shepherd suffers from pulmonary problems.

129. Plaintiff Jihye Esther Song, whose address is 1800 Oak Street, Unit 106, Torrance, California 90501, is a U.S. citizen who is a permanent resident of the State of California.

130. Plaintiff Jihye Esther Song was deployed in September 2008 to Balad Air Dorce Base and FOB Warhorse.

131. Plaintiff Song was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

132. As a direct result of her exposure to the burn pits and because of their faulty design, Plaintiff Song suffers from medical problems.

133. Plaintiff Arnold Valerio, whose address is 11456 Prairie Wood Drive, San Diego, California 92126, is a U.S. citizen who is a permanent resident of the State of California.

134. Plaintiff Arnold Valerio was deployed to Bagram Air Force Base from March 2009 to December 2009 with ITT.

135. Plaintiff Valerio was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

136. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff Valerio suffers from severe sleep apnea, bronchitis, asthma and neurological problems.

137. Plaintiff Lisa Bumpus, surviving spouse of Matthew Bumpus, deceased, is a U.S. citizen who is a permanent resident of the State of California. Her address is 1951 Ajay Drive, Roseville, California 95678.

138. Plaintiff's decedent, SSgt. Matthew Bumpus, served in the United States Army for eight years and nine months. He spent one year in Iraq, positioned in and around Balad and Al Mosul. He was a Staff Sergeant, Command Section Sergeant and Stryker Vehicle Commander. He served in Charlie Company, 2nd Battalion, 3rd Infantry.

139. SSgt. Bumpus was regularly exposed to the toxic emissions from the burn pits. As a direct result of his exposure to the toxic emissions from the burn pits in Iraq, he was diagnosed with acute myelogenous leukemia on July 31, 2006.

140. In Congressional testimony in front of the U.S. Senate Committee on Veterans' Affairs, Stacy Pennington described SSgt. Bumpus' battle, "Matt's mother will never forget the discouragement and sadness that overwhelmed Matt as the realization that promises he made to his wife and children to provide for his family, to love and protect them and that his sacred word would be broken." She went on to describe the heartbreak experienced by Plaintiff Bumpus' son, "Matt's 10 year old son, bravely entered his father's hospital room to lay on his Daddy's chest as he said his final

goodbye. Nate curled up by his Dad and cried and cried.” *VA/DOD Response to Certain Military Exposures. Before the U.S. Senate Committee on Veterans’ Affairs*, 111<sup>th</sup> Cong. (2009) (statement of Stacy Pennington, Sister of Ssg. Steven Gregory Ochs, Iraqi Operation Freedom and Operation Enduring Freedom Veteran).

141. Decedent SSgt. Matthew Bumpus died from acute myelogenous leukemia on August 3, 2008.

142. Plaintiff Marcos Barranco is a U.S. citizen who is a permanent resident of the State of Colorado, residing at 7756 Orange Sunset Drive, Colorado Springs, Colorado 80922.

143. Plaintiff Marcos Barranco was deployed to Iraq on two occasions: first to Camp Ramadi from August 2004 to August 2005; and second to Camp Loyalty from October 2006 to January 2008. Plaintiff Barranco served as a logistics technician.

144. At both locations, Plaintiff Barranco was constantly exposed to the harmful toxins emitted from burn pits designed and operated by Defendants.

145. As a direct result of his exposure to the burn pits, Plaintiff Barranco suffered from skin rashes which scarred his face, shortness of breath, chest tightness, and dizziness. He uses a CPAP machine daily.

146. Plaintiff Joel Lugo is a U.S. citizen who is a permanent resident of the State of Colorado, residing at 1890 Capital Drive, Colorado Springs, Colorado 80951.

147. Plaintiff Joel Lugo was deployed to Camp Ramadi from August 2004 to August 2005 and to Camp Loyalty from October 2006 to December 2007.

148. Plaintiff Lugo was constantly exposed to the harmful toxins emitted from burn pits designed and operated by Defendants.

149. As a direct result of his exposure to the burn pits, Plaintiff Lugo suffers from sleep apnea and shortness of breath and must use a breathing machine.

150. Plaintiff Shawn Thomas Sheridan is a U.S. citizen who is a permanent resident of the State of Colorado, residing at 60 Savage Loop, Canon City, Colorado 81212.

151. Plaintiff Shawn Thomas Sheridan was deployed to Balad Air Base from September 2003 to March 2004 and again from October 2005 to October 2006. He maintained radio communications.

152. Plaintiff Sheridan was constantly exposed to the harmful toxins emitted from burn pits designed and operated by Defendants. According to Plaintiff Sheridan, the black smoke from the burn pits was so thick that he was unable to see through it with night-vision goggles. Katie Connolly, *A Sickening Situation*, Newsweek, at <http://www.newsweek.com/id/204198> (last visited March 4, 2010)

153. As a direct result of his exposure to the burn pits, Plaintiff Sheridan suffers from upper respiratory infections, dermagraphic erdekaria, migraines, chronic kidney disease, fatigue and chronic respiratory problems.

154. Plaintiff Jayson Williams is a U.S. citizen who is a permanent resident of the State of Colorado, residing at 90 Landoe Lane, Colorado Springs, Colorado 80911.

155. Plaintiff Jayson Williams was deployed three times to Iraq. The first time, in 2003, he was stationed around several bases in Iraq, including Mosul. From 2005 to 2006, he was stationed at Balad Air Base. From 2007 to 2008, he was stationed at Mosul. Plaintiff Williams worked in food services.

156. Plaintiff Williams constantly exposed to the harmful toxins emitted from burn pits designed and operated by Defendants.

157. As a direct result of his exposure to the burn pits, Plaintiff Williams suffers from COPD, emphysema and sleep apnea. He requires an oxygen machine 24 hours a day.

### **CONNECTICUT**

158. Plaintiff Eunice Ramirez is a U.S. citizen who is a permanent resident of the State of Connecticut, residing at 20 Samuelson Road, Weston, Connecticut 06883.

159. Plaintiff Eunice Ramirez was deployed to Balad Air Base from December 2003 to February 2005 with the 188 Air Support Medical Battalion.

160. Plaintiff Ramirez served as a ground ambulance medic transporting patients back and forth to the hospital. She had to travel directly next to the burn pits in order to quickly transport patients to the hospital.

161. Plaintiff Ramirez was constantly exposed to harmful toxins emitted from the burn pits designed and operated by Defendants.

162. As a direct result of her exposure to the burn pits, Plaintiff Ramirez suffers from pulmonary complications, migraines, and persistent upper respiratory infections.

### **FLORIDA**

163. Plaintiff Maurice Callue, whose address is 14274 S.W. 108 Court, Miami, Florida 33176, is a U.S. citizen who is a permanent resident of the State of Florida.

164. Plaintiff Maurice Callue was an employee of Defendants from 2004 to 2007 and again from 2008 to the present as a Crew Chief and firefighter. He has been stationed in Kandahar, Afghanistan at Al-Taqaddum and at Forward Operating Base Q-

West. Mr. Callue has responded to numerous hazardous dump fires and other toxic situations caused by Defendants' improper operation of the burn pits. He lives with the constant haze, ash and smoke smell from the burn pits. He suffers from constant fatigue, eye irritation, coughing with phlegm, difficulty breathing during exercise, chest tightness, sinus pressure, constant headache, and frequent respiratory infections.

165. Plaintiff Edgar Andy Alvarado, whose address is P.O. Box 567, Intercession City, Florida 33848, is a U.S. citizen who is a permanent resident of the State of Florida.

166. Plaintiff Edgar Andy Alvarado was deployed to Balad, and also spent time at Fallujah, Tikrit and Mosul with the 194<sup>th</sup> Transportation Unit.

167. Plaintiff Alvarado was constantly exposed to hazardous toxins emitted by burn pits designed and operated by Defendants.

168. As a direct result of his exposure to the burn pits, Plaintiff Alvarado suffers from nasal polyps and allergies.

169. Plaintiff Philip Bace, whose address is 24123 Peachland Boulevard, Unit C4 #457, Port Charlotte, Florida 33954, is a U.S. citizen who is a permanent resident of the State of Florida.

170. Plaintiff Philip Bace was deployed to Mosul and Tal Afar from June 2005 to April 2006.

171. Plaintiff Bace was constantly exposed to the harmful toxins emitted from burn pits designed and operated by Defendants.

172. As a direct result of his exposure to the burn pits, Plaintiff Bace suffers from pulmonary problems and high blood pressure.

173. Plaintiff Val R. Batts, whose address is 2214 Topaz Lane, Plant City, Florida 33566, is a U.S. citizen who is a permanent resident of the State of Florida.

174. Plaintiff Val R. Batts was deployed to Iraq twice. First, from 2003 to 2004, she was deployed to Balad Air Base and Camp Victory. From 2008 to 2009, she was deployed to the Green Zone and FOB Al Mussayib.

175. Plaintiff Batts was constantly exposed to the harmful toxins emitted from burn pits designed and operated by Defendants.

176. As a direct result of her exposure to the burn pits, Plaintiff Batts suffers from skin conditions.

177. Plaintiff Craig Belanger, whose address is 2082 Corner Lake, Haines City, Florida 33844, is a U.S. citizen who is a permanent resident of the State of Florida.

178. Plaintiff Craig Belanger was deployed to Iraq with the US Army as a convoy truck driver. He served at Balad Air Base from April 2003 to April 2004.

179. Plaintiff Belanger was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

180. As a direct result of his exposure to the burn pits, Plaintiff Belanger suffers from vision problems, sleeping problems, depression and anxiety.

181. Plaintiff Dennis Wayne Briggs, whose address is 868 San Pedro Court, Kissimmee, FL 34758, is a U.S. citizen who is a permanent resident of the State of Florida.

182. Plaintiff Dennis Wayne Briggs was a Sergeant First Class and platoon leader with the 196<sup>th</sup> Transportation Company of the United States Army at Balad Air Base. During his deployment SFC Briggs lived in a tent across the street from the burn

pit and was assigned to guard the burn pit. He suffers from vomiting, rashes, skin bumps, PTSD, sexual dysfunction, sleep disturbances, cold sweats, congestion, migraines, coughing and difficulty breathing.

183. Plaintiff Edward Lee Buquo, whose address is 4415 Anastasia Court, Tallahassee, Florida 32305, is a U.S. citizen who is a permanent resident of the State of Florida.

184. Plaintiff Edward Lee Buquo was a U.S. Air Force Staff Sergeant in the 202<sup>nd</sup> Red Horse squadron, deployed to Balad Air Base in Iraq. While there, he worked in close proximity to the burn pit and was exposed to heavy smoke and falling ash from the burn pit. As a result of his exposure, he suffers from chest pain and stage two Hodgkin's lymphoma.

185. Plaintiff Edward Lee Buquo received an honorable discharge from the military and cannot renew his orders because of his medical condition caused by the burn pits.

186. Plaintiff Jamilette Cardona, whose address is 3916 Emerald Tree Lane, Kissimmee, Florida 34744, is a U.S. citizen who is a permanent resident of the State of Florida.

187. Plaintiff Jamilette Cardona was deployed to Tikrit, Iraq from July 2003 to April 2004. She worked with fuel convoys.

188. Plaintiff Cardona was constantly exposed to the toxins emitted from burn pits designed and operated by Defendants.

189. As a direct result of her exposure to the burn pits and because of their faulty design, Plaintiff Cardona suffers from pulmonary complications, intermittent

rashes, migraines, arthritis, chest pain, PTSD, abnormal menstrual cycle and eye infections.

190. Plaintiff Philip Cuthbertson, whose address is 10814 Manchester Road, Port Richey, Florida 34668, is a U.S. citizen who is a permanent resident of the State of Florida.

191. Plaintiff Philip R. Cuthbertson was deployed to Iraq and Afghanistan three times. First, he was deployed to Bagram Air Force Base from November 2002 to March 2003. Next, he was deployed to Balad Air Base from February 2005 to October 2005. Finally, he was deployed to Forward Operating Base Salerno in Afghanistan from January 2007 to February 2008. Plaintiff Cuthbertson worked as an aircraft structural repairer.

192. During each of his deployments, Plaintiff Cuthbertson was exposed to heavy smoke and fumes from the burn pit. Plaintiff Cuthbertson suffers from recurrent severe bronchitis, burning in the back of his throat, and constant, painful coughing, as well as shortness of breath, fatigue and severe headaches.

193. Plaintiff David DeBatto, whose address is 1827 Latelia Court, Trinity, Florida 34655, is a U.S. citizen who is a permanent resident of the State of Florida.

194. Plaintiff David DeBatto was deployed to Balad Air Base with the US army from April 2003 to October 2003 with the 223<sup>rd</sup> Military Intelligence Battalion.

195. Plaintiff DeBatto was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

196. As a direct result of his exposure to the burn pits, Plaintiff DeBatto suffers from respiratory problems, headaches, nausea, memory loss, fibromyalgia, PTSD and prostate cancer.

197. Plaintiff Wayne E. Fabozzi, whose address is 207 3rd Street, Niceville, Florida 32578, is a U.S. citizen who is a permanent resident of the State of Florida.

198. Plaintiff Wayne E. Fabozzi was sent to Iraq by Defendants as a Heavy Equipment Operator for Incineration. Mr. Fabozzi witnessed the burning of vast quantities of plastics, batteries, items coated in chemicals, computer components and blood-covered medical waste. He worked within a constant cloud of smoke; at times the smoke was so thick that there was no visibility and the smoke caused vomiting in those nearby. During his time at Camp Kalsu and to date, Mr. Fabozzi suffers from debilitating headaches, sinus pressure, chronic coughing with black mucous, painful chest tightness, and extreme fatigue.

199. Plaintiff Sharlene S. Jaggernaut, whose current address is 5404 Claymont Drive, Apartment 202, Alexandria, Virginia 22309, has been a resident of the Commonwealth of Virginia since February 2008. She is a U.S. citizen. At all times relevant to this lawsuit, including during her deployment, she was a resident of the State of Florida living at 300A Clifford St Fort Walton Beach, Florida 32547. Ms. Jaggernaut currently maintains a residence in the State of Florida at 12172 Saint Andrews Place, Apartment 110, Miramar, Florida 33025.

200. Plaintiff Sharlene S. Jaggernaut was deployed as a Staff Sergeant with the U.S. Air Force to Balad Airbase in Iraq. While there, she endured the smell of the

burn pit and inhaled its toxic smoke and ash on a constant basis. Sergeant Jaggernaut suffers from blood clots and stage three ovarian cancer (granulosa tumor).

201. Plaintiff Floyd James Johnson Sr., whose address is 1137 Acapella Drive, Malvern, Florida 32940, is a U.S. citizen who is a permanent resident of the State of Florida.

202. Plaintiff Floyd James Johnson Sr. was deployed to Balad Airbase in Iraq with the 196<sup>th</sup> Transportation Company of the United States Army. He guarded the burn pit on a daily basis, and the tent in which he slept was located across the street from the burn pit. Plaintiff Johnson worked and slept beneath a dark cloud of smoke and ash from the burn pit, eating his meals while performing guard duty in the open air next to the burn pit. He suffered from a skin rash which spread from his back to his limbs and extremities and suffers from debilitating headache syndrome, constant cough, difficulty breathing, excessive snoring, and persistent respiratory infections.

203. Plaintiff Tamra Johnson was deployed to Balad Air Base with the United States Air Force as a nurse from January through May 2005.

204. Plaintiff Johnson was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Plaintiffs.

205. As a direct result of her exposure, Plaintiff Johnson was diagnosed with breast cancer.

206. Plaintiff Richard Lee Keith, whose address is 840 Hannah Road, Pierson, FL 32180, is a U.S. citizen who is a permanent resident of the State of Florida.

207. Plaintiff Richard Lee Keith was a Staff Sergeant (now a Sergeant) with the 196<sup>th</sup> Transportation Company of the United States Army stationed at Balad. During

deployment, Sergeant Keith was exposed to smoke, ash and fumes from the burn pit while sleeping less than 150 feet away and while guarding the camp and the burn pit itself. He suffers from rashes, severe sinus infection, fever, and upper respiratory problems, including chronic shortness of breath.

208. Plaintiff Daniel Santiago Morales, whose address is 1015 Wisconsin Avenue, Saint Cloud, Florida 34769, is a U.S. citizen who is a permanent resident of the State of Florida.

209. Plaintiff Daniel Santiago Morales was a Staff Sergeant (now a Sergeant) with the 196<sup>th</sup> Transportation Company of the United States Army stationed at Balad. During deployment, Sergeant Morales suffered from vomiting, diarrhea, headaches, a whole-body red rash, and a separate rash which included white spots all over his body, especially under his armpits, on his stomach and on his genitalia. He continues to suffer from respiratory problems, blinding headaches, white spots, sleep apnea and low blood oxygen levels. He sleeps with a CPAP machine for the sleep apnea and oxygen.

210. Plaintiff Phillip McQuillan, whose address is 3731 23rd Avenue SW, Naples, Florida 34117, is a U.S. citizen who is a permanent resident of the State of Florida.

211. Plaintiff Phillip McQuillan was a truck driver with the 196<sup>th</sup> Transportation Company of the United States Army stationed at Balad. He slept in a non-ventilated tent across the street from the Balad burn pit each night. During the day, he drove loads to the burn pit and dumped them, and also worked as a burn pit guard. He saw no sorting of metals, plastics, hazardous waste or medical waste. During his deployment and since his return from Balad, he suffers from headaches, stomach pain,

sleep disorder, fatigue, diarrhea, high fever, sinus pressure, constant congestion, difficulty breathing, and thickening of the bladder walls.

212. Plaintiff James Pollock is a U.S. citizen who is a permanent resident of the State of Florida, residing at 3902 SW Coquina Cove Way, Apt 107, Palm City, Florida 34990.

213. Plaintiff James Pollock was deployed to Balad Air Base twice. First he was there from 2005 to 2006 and again in 2008.

214. Plaintiff Pollock was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

215. As a direct result of his exposure to the burn pits, Plaintiff Pollock suffers from respiratory and pulmonary problems.

216. Plaintiff Ildebbrando Perez, whose address is 14635 SW 48th Avenue, Ocala, Florida 34473, is a U.S. citizen who is a permanent resident of the State of Florida.

217. Plaintiff Ildebbrando Perez was a Staff Sergeant with the 317<sup>th</sup> movement control team of the U.S. Army, stationed in Iraq at Balad Airbase. He was regularly exposed to smoke, haze, ash and fumes from the burn pit. As a result, he suffers from pulmonary problems, sleep apnea and asthma. He depends on a breathing machine while sleeping and upon inhalers when awake.

218. Plaintiff Luigi Antonio Provenza, whose address is 593 Rainier Drive, Pittsburgh, Pennsylvania 15239, is a U.S. citizen who has been a resident of the Commonwealth of Pennsylvania since August 2008. At all times relevant to this lawsuit,

including during his deployment, he was a resident of the State of Florida living at 8501 Astronaut Boulevard, Suite 5297, Cape Canaveral, Florida 32920

219. Plaintiff Luigi Antonio Provenza was a truck driver with the 196<sup>th</sup> Transportation Company of the United States Army stationed in Iraq. He slept in a tent across the street from the Balad burn pit each night. Mr. Provenza's duties included twelve hour shifts guarding the burn pit at Balad. He saw massive truckloads of unsorted garbage dumped on the burn pit, including plastics, equipment and unspent ammunition that would ignite on the pit. During deployment, he contracted bronchitis, sinusitis, and severe epididymitis, and respiratory infections. He continues to suffer from chest tightness, shortness of breath, pain during breathing, restrictive lung disease, apnea, and cysts on his right lung. He requires a CPAP machine.

220. Plaintiff Ruth Ann Reece, whose address is 18026 Lindawoods Street, Odessa, Florida 33556, is a U.S. citizen who is a permanent resident of the State of Florida.

221. Plaintiff Ruth Ann Reece was a critical care nurse with the United States Air Force stationed at Balad Airbase. Lt. Colonel Reece worked outside in the contingency aero-medical staging facility on a daily basis, loading injured service members onto aircraft. Her work area and her trailer sleeping quarters were filled with black smoke. She suffers from constant cough, pneumonia and uterine cancer.

222. Plaintiff Jose Luis Rivera, whose address is 1233 Epsom Oaks Way, Orlando, Florida 32837, is a U.S. citizen who is a permanent resident of the State of Florida.

223. Plaintiff Jose Luis Rivera was deployed to Balad Air Base from April 2003 to April 2004 with the United States Army.

224. Plaintiff Rivera was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants, as well as contaminated water provided by Defendants.

225. As a direct result of his exposure to the burn pits and contaminated water, Plaintiff Rivera suffers from respiratory problems, asthma, emphysema, and gastrointestinal issues.

226. Plaintiff Willis R. Rowe, whose address is 10219 North Oklawaha Avenue, Tampa, Florida 33617, is a U.S. citizen who is a permanent resident of the State of Florida.

227. Plaintiff Willis R. Rowe was deployed with the Texas Army National Guard to Baghdad from February 2006 to November 2007.

228. Plaintiff Rowe was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

229. As a direct result of his exposure to the burn pits, Plaintiff Rowe suffers from shortness of breath, anxiety, sleeping issues, high blood pressure, coughing and fatigue.

230. Plaintiff Eduardo Saavedra Sr., whose address is 14643 Brightwell Court, Orlando, Florida 32824, is a U.S. citizen who is a permanent resident of the State of Florida.

231. Plaintiff Eduardo Saavedra Sr. was deployed to Balad as a truck driver with the 196<sup>th</sup> Transportation Company of the United States Army. He lived in a tent

across the street from the Balad burn pit; because there was no air conditioning or other ventilation, the flaps of the tent were always kept open and the smoke and ash from the burn pit filled the sleeping quarters constantly. Mr. Saavedra experienced flu-like symptoms during his deployment. As a direct result of his exposures to the burn pits, he suffers from asthma, sleep apnea, respiratory problems, and a white spotted rash.

232. Plaintiff Ralph Lee Stout, whose address is 1513 Avenue G, NE, Winter Haven, Florida 33881, is a U.S. citizen who is a permanent resident of the State of Florida.

233. Plaintiff Ralph Lee Stout was deployed to Iraq twice. He was deployed from April 2003 to April 2004 to Balad Air Base. He was deployed from March 2008 to March 2009 to Arifjan, and also spent time at Camp Cedar and Mosul.

234. Plaintiff Stout was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants. As a direct result of his exposure to the burn pits, Plaintiff Stout suffers from respiratory and other medical problems.

235. Plaintiff Jill R. Wilkins, personal representative of Kevin E. Wilkins, deceased, is a U.S. citizen who is a permanent resident of the State of Florida. Her address is 216 Temple Circle, Eustis, Florida 32726.

236. United States Air Force Major Kevin E. Wilkins served in the United States Military during two tours of duty in Iraq – the first to Balad from May to August 2006, and the second to Qatar from January to April 2007. Major Wilkins was a member of the 920<sup>th</sup> Aeromedical Staging Squadron and served as a Critical Care Air Transport Teams nurse. While at Balad, Kevin Wilkins endured prolonged exposure to thick

smoke, fumes and ash, including unknown hazardous substances, from burn pits improperly operated by Defendants.

237. As a direct result of his exposures, Major Wilkins, who had no history of illness, suffered from blinding headaches, nausea and vomiting as a result of this prolonged exposure to hazardous substances. His exposures ultimately led to his admission to the hospital on March 26, 2008 and he died from a brain tumor six days later on April 1, 2008 at age 51.

238. Plaintiff Jill R. Wilkins is the surviving spouse and personal representative of decedent Kevin E. Wilkins. Major Wilkins was survived by two minor children. Major Wilkins died testate; his principal place of residence when not stationed with the United States Air Force was 216 Temple Circle, Eustis, Florida 32726.

239. Plaintiff Michael Donnell Williams, whose address is 135 Carver Avenue, Sanford, Florida 32771, is a U.S. citizen who is a permanent resident of the State of Florida.

240. Plaintiff Michael Donnell Williams was a truck driver with the 196<sup>th</sup> Transportation Company of the United States Army stationed at Balad. He slept in a non-ventilated tent across the street from the Balad burn pit each night. His duties included guard duty at the Balad burn pit. As a direct result of his exposures, he suffers from shortness of breath, labored breathing, and extreme fatigue.

241. Plaintiff Jermaine Lynell Wright, whose address is 1830 Pennington Avenue, Deltona, Florida 32738, is a U.S. citizen who is a permanent resident of the State of Florida.

242. Plaintiff Jermaine Lynell Wright was deployed with the 196<sup>th</sup> Transportation Company of the United States Army to Balad. He slept in a non-ventilated tent across the street from the Balad burn pit each night. He performed guard duty at the Balad burn pit. As a direct result of his exposures, Plaintiff Wright suffers from compromised respiratory function, constant congestion, and severe allergies.

### **GEORGIA**

243. Plaintiff Michael Douglas Moore, whose address is 1325 Loblolly Drive, Hinesville, Georgia 31313, is a U.S. citizen who is a permanent resident of the State of Georgia.

244. Plaintiff Michael Douglas Moore was deployed to Traq with the U.S. Army and was stationed at Balad Air Base in 2005 and 2006. During that time, Plaintiff Moore's living and working location was near the burn pits and he was exposed to large quantities of thick black smoke and toxic fumes. He developed a chronic, hacking cough and would wake up in the night choking and coughing. His condition deteriorated and he was evacuated from Balad Air Base with a diagnosis of post traumatic stress disorder. He was given a sleep study and diagnosed with severe sleep apnea and breathing problems. Plaintiff Moore underwent jaw surgery in an effort to address his breathing problems and sleep apnea and was left with facial scars. He has taken many courses of steroid treatments in an effort to control his condition. Plaintiff Moore's breathing problems and subsequent sleep disorder and surgery were caused by his exposure to the toxic emissions and smoke from the burn pits.

245. Since Plaintiff Moore's return from Iraq, he has been plagued by chronic coughing, sleep apnea, decreased lung capacity, physical scars and post-traumatic stress

disorder. Plaintiff Moore suffers from recurrent bronchitis requiring hospitalizations. He is dependent on a sleep machine at night and has chronic pain that requires medication to control.

246. Plaintiff Moore is in physical therapy to help regain movement in his jaw. Plaintiff Moore's continuing medical problems are the result of his exposure to the burn pits.

247. Prior to his deployment, Plaintiff Moore was in excellent health and physical shape, running six miles every day. After living for nine months less than 50 yards from the bum pit, he is unable to walk to even his mailbox without pain.

248. Plaintiff Hugh Carlton Giles, III, whose address is 2477 Upper Big Springs Road, LaGrange, Georgia, 30241, is a U.S. citizen who is a permanent resident of the State of Georgia.

249. Plaintiff Giles was deployed to Balad Air Base from October 2007 to May 2008.

250. Plaintiff Giles was constantly exposed to toxins emitted from burn pits designed and operated by Defendants.

251. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff Giles suffers from pulmonary complications and respiratory infections, and a persistent cough.

252. Plaintiff Tony Muckle, whose address is 3635 Thurman Road, College Park, Georgia 30349, is a U.S. citizen who is a permanent resident of the State of Georgia.

253. Plaintiff Tony Muckle worked for KBR and deployed to Forward Operating Base Caldwell and Camp Victory in 2004.

254. Plaintiff Muckle was constantly exposed to toxins emitted from burn pits designed and operated by Defendants.

255. As a direct result of his exposure to the burn pits, Plaintiff Muckle suffers from pulmonary complications and fatigue.

256. Plaintiff Khalid W. Wise, whose address is 1985 Wrights Way, Jonesboro, Georgia 30236, is a U.S. citizen who is a permanent resident of the State of Georgia.

257. Plaintiff Khalid Wise was deployed to Iraq from March 2006 to September 2006 at various bases, including FOB Warhorse, Camp Liberty and Balad Air Base.

258. Plaintiff Wise was constantly exposed to toxins emitted from burn pits designed and operated by Defendants.

259. As a direct result of his exposure to the burn pits, Plaintiff Wise suffers from sleep apnea, pulmonary complications, migraines and neurological problems.

## **HAWAII**

260. Plaintiff Edward Adams, whose address is 155 Belcher Court, Apartment 104, Wahiawa, Hawaii 96786, is a U.S. citizen who is a permanent resident of the State of Hawaii.

261. Plaintiff Edward Adams was deployed to Camp Speicher in Iraq from July 2006 to October 2007. He worked as an avionics technician, but he also served on guard duty on the base. He lived approximately 500 meters downwind from the burn pit. The smoke from the burn pit would blow directly over his living area. He describes, "At

night, it was like stepping into a sewer. There was a giant black cloud.” Kelly Kennedy, *Lung disease of soldier linked to burn pits*, Army Times, at [http://www.armytimes.com/news/2009/06/military\\_burnpits\\_lungs\\_063009w/](http://www.armytimes.com/news/2009/06/military_burnpits_lungs_063009w/) (last visited Mar. 4, 2010).

262. Six months into his tour, Plaintiff Edward Adams had difficulty running and developed chest pains. His symptoms persisted and he had to be admitted to the hospital upon his return because he could not breathe. Lesions were found throughout his lungs. He suffers from aortic stenosis and interstitial lung disease.

263. Plaintiff Sevim Aybulut, whose address is 95-349 Kuahelani Avenue, Apartment C-2, Mililani, Hawaii 96789, is a U.S. citizen who is a permanent resident of the State of Hawaii.

264. Plaintiff Sevim Aybulut was deployed to Camp Speicher from June 2007 to October 2007.

265. Plaintiff Aybulut was constantly exposed to the toxins emitted by burn pits designed and operated by Defendants.

266. As a direct result of her exposure to the toxins emitted by the burn pits, Plaintiff Aybulut suffers from breast cancer and pulmonary complications.

267. Plaintiff Kenneth Baldwin, whose address is 6 Kiohuohu Lane, Apartment 1, Lahaina, Hawaii 96761, is a U.S. citizen who is a permanent resident of the State of Hawaii.

268. Plaintiff Kenneth Baldwin was deployed to Balad Air Base from January 2005 to January 2006 as part of the 29<sup>th</sup> Brigade Combat Team. He worked on base

security and was on the Quick Reaction Force Team, which was tasked with responding to any incidents or threats on the perimeter of the base.

269. Plaintiff Kenneth Baldwin's living quarters were just over a mile from the burn pit and he was constantly living in an unrelenting cloud of smoke.

270. While in Iraq, Plaintiff Kenneth Baldwin developed asthma, an unexplained skin rash, Irritable Bowel Syndrome and migraine headaches. Prior to his deployment, he was a marathon runner and avid professional scuba diver. He can no longer run due to his asthma and his ability to dive has also been affected. As a direct result of Defendants' misconduct, Plaintiff Baldwin lost his ability to earn a living as a police officer as a result of his inability to run.

271. Plaintiff Donna Wu, whose address is 47-158 Lile Place, Kaneohe, Hawaii 96744, is a U.S. citizen who is a permanent resident of the State of Hawaii.

272. Plaintiff Donna Wu was stationed at Balad Air Base from February 2005 to January 2006. As a direct result of Defendants' misconduct, Plaintiff Wu suffers from a brain tumor, known as Schwannoma. She also suffers from constant pain and requires constant monitoring of her tumor.

## **IDAHO**

273. Plaintiff George Lundy is a U.S. citizen who is a permanent resident of the State of Idaho, residing at 4169 North 1800 East, Preston, Idaho 83263.

274. Plaintiff George Lundy was hired by KBR in 2004 and worked at Camp Bucca, Iraq from 2005 to 2009.

275. One of Plaintiff Lundy's primary responsibilities at Camp Bucca was to build new burn pits when the other pits became too full.

276. Plaintiff Lundy saw mattresses, plastic and Styrofoam being burned in the burn pit.

277. Plaintiff Lundy was constantly exposed to the harmful toxins emitted from the burn pits operated by Defendants and was harmed because of their faulty design and operation.

278. Plaintiff Lundy breathed in the smoke and ash as he worked.

279. As a direct result of his exposure to the burn pit, Plaintiff Lundy has suffered from blurry vision, memory loss, skin rashes and colon cancer. He is currently undergoing chemotherapy.

## **ILLINOIS**

280. Plaintiff David U. Lackey is a United States citizen who is a permanent resident of the State of Illinois, residing at 4114 35th Avenue, Moline, Illinois 61265.

281. Plaintiff David Lackey was deployed by the United States Army and stationed at Balad Air Base in Iraq from March 2004 through August 2004, where he was exposed to the toxic smoke and fumes from a burn pit. He also served another tour in Taji in Iraq in 2008, where he was also exposed to a burn pit.

282. As a direct result of exposure to toxic emissions from the burn pits, Plaintiff Lackey began to suffer from chronic cough and respiratory problems. Plaintiff Lackey suffers from upper respiratory problems, auto immune system conditions, and brain cancer. Plaintiff Lackey was forced to undergo brain surgery due to Defendants' misconduct.

283. Plaintiff Randall L. Robinson is a United States citizen who is a permanent resident of the State of Illinois, residing at 4571 Lindbloom Lane, Cherry Valley, Illinois 61016.

284. Plaintiff Randall Robinson was deployed by the United States Army to Iraq and was stationed at many bases around the country including Balad, Striker and Adder. He is currently deployed near Kabul, Afghanistan and continues to be exposed to toxic fumes from the burn pits.

285. As a direct result of exposure to toxic emissions from the burn pits, Plaintiff Randall Robinson suffers from chronic coughing, respiratory infections and chronic debilitating headaches. Plaintiff Robinson needs inhalers to breathe.

286. Plaintiff Austin Watts is a U.S. citizen who is a permanent resident of the State of Illinois, at PO Box 72, Wedron, Illinois 60557.

287. Plaintiff Austin Watts was deployed to Balad Air Base from June 2006 to September 2007. He was part of a security escort team. Plaintiff Watts was constantly exposed to the toxins emitted from the burn pits designed and operated by Defendants.

288. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff Watts suffers from severe migraines, a chronic cough and constant colds.

289. Plaintiff Matthew Stephen Baxter is a United States citizen who is a permanent resident of the State of Illinois, residing at 804 Adrienne Avenue, Ottawa, Illinois 61350.

290. Plaintiff Matthew Stephen Baxter was deployed to CFC Scania from April 2003 to July 2004. Plaintiff Baxter was constantly exposed to the toxins emitted from burn pits designed and operated by Defendants.

291. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff Baxter suffers from leukemia. As a result of Defendants' misconduct, he has been forced to undergo several surgeries, as well as chemotherapy and radiation.

## **INDIANA**

292. Plaintiff Dan Bowlds is a U.S. citizen who is a permanent resident and citizen of the State of Indiana, residing at 7137 Greenlake Drive, Evansville, Indiana 47711.

293. Plaintiff Dan Bowlds was deployed to Iraq from January 2006 to August 2006 and spent time at Balad Air Base, Camp Victory, Camp Liberty and Kirkuk.

294. Plaintiff Bowlds was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

295. As a direct result of his exposure to the burn pits, Plaintiff Bowlds has experienced sleeping problems and had a calcification removed from his lung.

296. Plaintiff Tony Allen Gouckenour is a U.S. citizen who is a permanent resident and citizen of the State of Indiana, residing at 212 S. Jefferson St. Worthington, Indiana 47471.

297. Plaintiff Tony Allen Gouckenour was deployed to Balad Air Base from March 2008 to September 2008.

298. Plaintiff Gouckenour ran a maintenance shop and supported convoys.

299. Plaintiff Gouckenour was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

300. As a direct result of his exposure to the burn pits, Plaintiff Gouckenour suffers from skin damage, sleep apnea, breathing problems, diabetes, and neurological problems. He must use a CPAP breathing machine.

301. Plaintiff John William Jackson is a U.S. citizen who is a permanent resident and citizen of the State of Indiana, residing at 9345A Barcroft Drive, Indianapolis, Indiana 46240.

302. Plaintiff John William Jackson was a KBR employee who went to Balad Air Base in July 2005 until November 2006.

303. Plaintiff Jackson was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

304. As a direct result of his exposure to the burn pits, Plaintiff Jackson experienced fatigue and had trouble breathing. He was diagnosed with colon cancer in November 2008. Plaintiff Jackson recently finished his 17<sup>th</sup> round of chemotherapy.

305. Plaintiff Thomas Kelleck is a U.S. citizen who is a permanent resident and citizen of the State of Indiana, residing at 1889 West 85<sup>th</sup> Avenue, Apartment M351, Merrillville, Indiana 46410.

306. Plaintiff Thomas Kelleck worked for Wackenhut Services as a contract firefighter. He arrived in Baghdad in November 2004 and was sent to Mosul until May 2006.

307. Plaintiff Kelleck was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

308. As a direct result of his exposure to the burn pits, Plaintiff Kelleck suffers from pulmonary complications.

309. Plaintiff John Pete Troost is a U.S. citizen who is a permanent resident and citizen of the State of Indiana, residing at 2031 W. Hamilton Road, Ft. Wayne, Indiana 46819.

310. Plaintiff John Pete Troost was deployed to Balad Air Base with the Indiana National Guard from January 2006 to March 2006. He worked on survival equipment.

311. Plaintiff Troost's housing unit was very close to the burn pits and the smoke from the pits used to linger in the air.

312. Plaintiff Troost was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

313. As a direct result of his exposure to the burn pits, Plaintiff Troost suffers from pulmonary complications, sleep apnea and chest infections.

314. Plaintiff Deborah Ann Wheelock is a U.S. citizen who is a permanent resident and citizen of the State of Indiana, residing at 216 H. Street, Bedford, Indiana 47241.

315. Plaintiff Deborah Ann Wheelock was deployed to Balad Air Base from March 2008 to November 2006 with the 293<sup>rd</sup> Infantry Battalion. She worked in maintenance.

316. Plaintiff Wheelock was repeatedly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

317. As a direct result of her exposure to the burn pits, Plaintiff Wheelock suffers from a chronic cough, COPD, gastrointestinal problems, glaucoma, memory loss and forgetfulness.

## **IOWA**

318. Plaintiff Lee Warren Jellison is a U.S. citizen who is a permanent resident of the State of Iowa, residing at 212 S. Madison Street, Manchester, Iowa 52057.

319. Plaintiff Lee Warren Jellison, Jr. was deployed to Balad Air Base in August 2008 until May 2009 with the 834th Aviation Support Battalion. He served as an avionics mechanic fixing helicopters.

320. Plaintiff Jellison was constantly exposed to the hazardous toxins emitted from the burn pits operated and designed by Defendants.

321. During his deployment, he developed respiratory issues as a direct result of his exposure to the burn pits. Upon his return to the United States, he had to go to the emergency room on two occasions because he could not breathe.

322. Furthermore, because of his exposure to the burn pits, Plaintiff Jellison has been diagnosed with asthma, has suffered from pneumonia, has developed a giant bullae in his right lung which had to be surgically removed and has several smaller bullae in his left lung.

## **KANSAS**

323. Plaintiff Wallace McNabb, whose address is 205 South Clinton Street, Mankato, Kansas 66956, is a U.S. citizen who is a permanent resident of the State of Kansas.

324. Plaintiff Wallace McNabb was stationed at Camp Anaconda in Iraq and Camp Bucca in Iraq. While there, he was exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

325. As a direct result of exposures to the toxic fumes from the burn pits, Plaintiff McNabb suffers from colorectal cancer. He was forced to undergo surgery, undergo chemotherapy and radiation treatment.

326. Plaintiff David J. Hildebrand is a U.S. citizen who is a permanent resident of the State of Kansas, residing at 129B Riverview Drive, Wamego, Kansas 66547.

327. Plaintiff David Hildebrand was deployed to Iraq from November 2004 to September 2005 at Al Asad and Balad Air Base. Plaintiff Hildebrand was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

328. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff Hildebrand suffers from chronic myeloid leukemia.

329. Plaintiff Jennifer McFarlane is a U.S. citizen who is a permanent resident of the State of Kansas, residing at 1185 SW Wayne, Topeka, Kansas 66604.

330. Plaintiff Jennifer MacFarlane was deployed to several bases in Iraq from April 2005 to June 2006, including Balad Air Base and Camp Speicher. Plaintiff McFarlane was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants, as well as contaminated water provided by Plaintiffs.

331. As a direct result of her exposure to the burn pits and to contaminated water, Plaintiff McFarlane suffers from gastrointestinal problems, eye issues, skin rashes and pulmonary complications.

332. Plaintiff Luther Fair Murray is a U.S. citizen who is a permanent resident of the State of Kansas, residing at 508 Palomino Lane, Ogden, Kansas 66517.

333. Plaintiff Luther Fair Murray was deployed to Iraq. During Plaintiff Luther Fair Murray's deployment, he was constantly exposed to hazardous toxins emitted by burn pits designed and operated by Defendants.

334. As a direct result of his exposure to the burn pits, Plaintiff Murray suffers from pulmonary and respiratory problems.

335. Plaintiff Daniel Robison is a U.S. citizen who is a permanent resident of the State of Kansas, residing at 2510 K Street, Belleville, Kansas 66935.

336. Plaintiff Daniel Robinson was deployed to Al Asad from September 2003 to February 2004 and again from August 2006 to February 2007. Plaintiff Robinson was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

337. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff Robinson suffers from pulmonary and respiratory problems.

## **KENTUCKY**

338. Plaintiff Charles Hicks, whose address is 313 Calvert Run Pike, Bellevue, Kentucky 41073, is a U.S. citizen who is a permanent resident of the Commonwealth of Kentucky.

339. Plaintiff Charles Hicks was deployed to Balad Air Base from 2004 to 2005.

340. Plaintiff Hicks was constantly exposed to the harmful toxins emitted from burn pits designed and operated by Defendants.

341. As a direct result of his exposure to the burn pits, Plaintiff Hicks has suffered from pulmonary problems, headaches and diabetes.

342. Plaintiff Sean Alexander Stough, whose address is 6275 Campton Road, Stanton, Kentucky 40380, is a U.S. citizen who is a permanent resident of the Commonwealth of Kentucky.

343. Plaintiff Sean Alexander Stough was deployed to Camp Bucca until April 2006 with the United States Air Force.

344. Plaintiff Stough was constantly exposed to the harmful toxins emitted from burn pits designed and operated by Defendants.

345. As a direct result of his exposure to the burn pits, Plaintiff Stough suffers from pulmonary problems, asthma, sleep apnea and neurological problems.

346. Plaintiff Shawn Hopkins, whose address is 5706 Garden Trace Circle, Louisville, Kentucky 40229, is a U.S. citizen who is a permanent resident of the Commonwealth of Kentucky.

347. Plaintiff Shawn Hopkins was deployed to Kirkuk from August 2005 to August 2006 with the 101<sup>st</sup> Airborne Division.

348. Plaintiff Hopkins was constantly exposed to the harmful toxins emitted from burn pits designed and operated by Defendants.

349. As a direct result of his exposure to the burn pits, Plaintiff Hopkins suffers from pulmonary complications, avascular necrosis and urticaria. Plaintiff Hopkins was forced to undergo a hip replacement as result of his avascular necrosis.

## **MAINE**

350. Plaintiff Danny LaPierre is a U.S. citizen who is a permanent resident of the State of Maine, residing at 139 S. Monmouth Road, Monmouth, Maine 04259.

351. Plaintiff Danny LaPierre was deployed in Tallil from February 2003 to February 2004 with the Army Reserves.

352. As part of Plaintiff LaPierre's duties, he was in charge of picking up trash and dumping it in the burn pits.

353. Plaintiff LaPierre was constantly exposed to harmful toxins emitted from the burn pits designed and operated by Defendants.

354. As a direct result of his exposure to the burn pits, Plaintiff LaPierre suffers from pulmonary complications.

#### **MARYLAND**

355. Plaintiff Alan Metzgar, whose address is 1121 University Blvd, Apt. 407, Silver Spring, Maryland, is a U.S. citizen who is a permanent resident of the State of Maryland.

356. Plaintiff Alan Metzgar was deployed to Iraq with the U.S. Army and was stationed at Balad Air Base. During his deployment, Plaintiff Metzgar was exposed to toxic emissions from the burn pits designed and operated by Defendants. As a direct result of these exposures, he suffers from chronic dry cough and irritated throat.

357. Plaintiff Paul Parker, whose address is 404 Gateswood Ct., Edgewood, Maryland, is a U.S. citizen who is a permanent resident of the State of Maryland.

358. Plaintiff Paul Parker was employed in Iraq by KBR and sent to Balad Air Base. During his deployment, Plaintiff Parker was exposed to toxic emissions from the burn pits designed and operated by Defendants. As a direct result of these exposures, Plaintiff Parker suffers from chronic respiratory illnesses, sleep apnea and chronic

shortness of breath. Plaintiff Parker is forced to rely on a machine to monitor his breathing at night.

359. Plaintiff Dennis Donehoo, whose address is 23280 Willow Creek Lane, California, Maryland, is a U.S. citizen who is a permanent resident of the State of Maryland.

360. Plaintiff Dennis Donehoo was a civilian firefighter working for Wackenhut Corporation, a subcontractor to Defendants. He was stationed at Camp Anaconda at Balad Air Base from August 2004 to May 2005. He was stationed at FOB Sykes, Tallafar from May 2005 to August 2005. While in Iraq, he was often called to put out fires at the burn pit. His company responded to calls at the burn pits when the smoke was so thick that it would hamper military operations.

361. As a direct result of his exposure to the toxic emissions from the burn pit, Plaintiff Donehoo suffers from respiratory infections. Once an avid runner, he now has trouble with physical activity.

362. Plaintiff Christopher Griffin, whose address is 834 Forest Glen Rd., Lusby, Maryland 20657, is a U.S. citizen who is a permanent resident of the State of Maryland.

363. Plaintiff Christopher Griffin was deployed to Iraq with the U.S Army and was stationed at Balad Air Base from August 2006 to August 2007 as a helicopter repairman. Plaintiff Griffin was exposed to toxic fumes emitted from the burn pits.

364. As a direct result of his exposures to the toxic fumes, Plaintiff Christopher Griffin suffers from respiratory problems, including persistent painful coughing.

365. Plaintiff Jon Austin Vance, whose address is 11804 White Pine Drive, Hagerstown, Maryland 21740, is a U.S. citizen who is a permanent resident of the State of Maryland.

366. Plaintiff Jon Austin Vance was deployed to Iraq with the U.S. Air Force from August 2005 to December 2005 to Balad Air Base. Plaintiff Vance lived and worked approximately one half mile from the burn pit designed and operated by Defendants. He saw “furniture, computers, trucks, etc. being burned.” Kelley Beaucar Vlahos, *Toxic exposure torments soldiers long after their tours end*, The American Conservative, at <http://www.amconmag.com/article/2009/oct/01/00014/> (last visited Mar. 4, 2010).

367. Plaintiff Vance was constantly exposed to toxic emissions from the burn pit. Plaintiff Jon Austin Vance witnessed a dog carrying a human arm through the compound. He also witnessed computers, airplane parts and chairs being thrown into the burn pit.

368. As a direct result of his exposure to the burn pit, Plaintiff Jon Austin Vance suffers from a persistent metallic taste in his mouth, frequent headaches, joint pains, fatigue, coughing, and respiratory issues.

369. Plaintiff Benjamin Boeke, whose address is 3944 Genteel Drive, Grove City, Ohio 43123, is a U.S. citizen who is a permanent resident of the State of Ohio.

370. Plaintiff Benjamin Boeke was deployed to Iraq with the U.S. Air Force and was stationed at Bald Air Force Base. As a biomedical engineer, he worked at night very close to the burn pit, and was constantly exposed to toxic emissions.

371. As a direct result of his exposures to the burn pit, Plaintiffs Boeke suffers from reactive airways disease and is forced to depend on an inhaler.

372. Plaintiff David Keehan, whose address is 5108 Bay Overlook Drive, Hermitage, Tennessee 37076, is a U.S. citizen who is a permanent resident of the State of Tennessee.

373. Plaintiff David Keehan was deployed to Iraq with the U.S. Air Force and was stationed at Balad Air Base. He was exposed to toxic emissions from the burn pit designed and operated by Defendants.

374. Plaintiff Keehan suffers from a serious skin rash with weeping lesions on his arms and feet.

375. Plaintiff Dennis Gogel, whose address is 1310 Rainier Street, Steilacoom, Washington 98399, is a U.S. citizen who is a permanent resident of the State of Washington.

376. Plaintiff Dennis Gogel was deployed to Iraq with the U.S. Army and was stationed at Balad Air Base. Plaintiff Gogel was a medic for his unit. As a medic, Plaintiff Gogel regularly treated other soldiers for chronic respiratory infections and chronic gastrointestinal distress.

377. As a direct result to his exposures to the toxic emissions from the burn pits designed and operated by Defendants, Plaintiff Gogel suffers from throat infections and constant recurring upper respiratory infections.

378. As a result of his exposure to contaminated water, Plaintiff Gogel also suffered severe gastrointestinal illness and lost over 40 pounds in six months time. He suffers from thickening of the wall of his stomach due to his gastrointestinal illness.

379. Plaintiff George Hartwell, whose address is 5384 Blair View, Colorado Springs, Colorado 80916, is a U.S. citizen who is a permanent resident of the State of Colorado.

380. Plaintiff George Hartwell was deployed to Iraq with the U.S. Army and was stationed at Balad Air Base and other installations in Iraq.

381. As a direct result of his exposures to the toxic emissions from the burn pits designed and operated by Defendants, Plaintiff Hartwell suffers from chronic, long-term shortness of breath.

382. Plaintiff Christopher Griffin, whose address is 834 Forest Glen Road, Lusby, Maryland 20657, is a U.S. citizen who is a permanent resident of the State of Maryland.

383. Plaintiff Christopher Griffin was deployed to Balad Air Base from August 2006 to August 2007 as a helicopter repairman.

384. Plaintiff Griffin was constantly exposed to hazardous toxins emitted by burn pits designed and operated by Defendants.

385. As a direct result of his exposure to the burn pits, Plaintiff Griffin suffers from respiratory problems.

386. Plaintiff John Michael Zajicek, whose address is 3132 Eden Drive, Abingdon, Maryland 21009, is a U.S. citizen who is a permanent resident of the State of Maryland.

387. Plaintiff John Michael Zajicek was deployed to Balad Air Base with the US Army.

388. Plaintiff Zajicek was constantly exposed to hazardous toxins emitted by burn pits designed and operated by Defendants.

389. As a direct result of his exposure to the burn pits, Plaintiff Zajicek suffers from memory loss and migraines.

390. Plaintiff Ricky J. Lamberth, whose address is 1429 Adamsview Road, Catonsville, Maryland 21228, is a U.S. citizen who is a permanent resident of the State of Maryland.

391. Plaintiff Ricky J. Lamberth was deployed to Kuwait, Iraq and Afghanistan from 2003 to 2009 in both military and civilian capacities.

392. Plaintiff Lamberth was constantly exposed to hazardous toxins emitted by burn pits designed and operated by Defendants. He testified in front of Congress, "From as close as 10 feet, I saw nuclear, biological and medical waste, including bloody cotton gauze, plastics, tires, petroleum cans, oils and lubricants thrown into burn pits. Vermin, wild dogs and jackals would roam the pits, carrying off debris." *Are Burn Pits in Iraq and Afghanistan Making Our Soldiers Sick? Before the Senate Democratic Policy Committee*, 111<sup>th</sup> Cong. (2009) (statement of Rick, Former KBR Employee).

393. As a direct result of his exposure to the burn pits, Plaintiff Lamberth suffers from recurrent respiratory problems.

394. Plaintiff Christopher M. Sweet is the surviving spouse of Jessica R. Sweet. He is a U.S. citizen who is permanent resident of the State of Maryland, residing at 3905 Woodreed Drive, Brandywine, Maryland 20613.

395. Plaintiff Christopher M. Sweet's decedent, Jessica R. Sweet, served with the United States Air Force in Afghanistan in 2007 as a Technical Sergeant.

396. Jessica R. Sweet was regularly exposed to the toxic emissions from the burn pits designed and operated by Defendants. As a direct result of her exposure to the toxic emissions from the burn pits in Afghanistan, she suffered from acute myelogenous leukemia.

397. Decedent Jessica Sweet died from acute myelogenous leukemia on February 12, 2009 at the age of 30.

398. Plaintiff David Jobes, whose address is 24314 Preakness Drive, Damascus, MD 20871, is a U.S. citizen who is a permanent resident of the State of Maryland.

399. Plaintiff David Jobes was deployed to Camp Falcon, Iraq with Wackenhut as a fireman from January 2006 to January 2007.

400. Plaintiff Jobes was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

401. As a direct result of his exposure to the burn pits, Plaintiff Jobes suffers from respiratory problems.

402. Plaintiff Terry Adkins is a U.S. citizen who resides at No. 4 SS3/59D Sungeiway Petaling Jaya Selangor 47301, Malaysia.

403. Plaintiff Adkins is a former KBR employee who was hired by them in 2008 as a heavy equipment operator.

404. Plaintiff Adkins was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

405. As a direct result of his exposure to the burn pits, Plaintiff Adkins suffers from pulmonary problems.

## MASSACHUSETTS

406. Plaintiff Jeffrey Morgan Cox is a U.S. citizen who is a permanent resident of the Commonwealth of Massachusetts, residing at 58 Endicott Street #2, Salem, Massachusetts 01970.

407. Plaintiff Jeffrey Morgan Cox is a Captain in the Massachusetts Army National Guard. Plaintiff Cox served in Iraq from 2005 to 2006 at Balad, the Green Zone and Camp Liberty.

408. Plaintiff Cox worked as a combat stress social worker.

409. Plaintiff Cox was exposed to the hazardous toxins emitted by the burn pits designed and operated by Defendants. For example, at Balad, Plaintiff Cox lived in a tent near the burn pits and would routinely awake surrounded by smoke. Plaintiff Cox described the burn pits as “the Agent Orange of the Iraq war.” Lisa Guerriero, *Salem soldier sues over burn pits in Iraq*, Salem Gazette, at <http://www.wickedlocal.com/salem/news/x2087396172/Salem-soldier-sues-over-burn-pits-in-Iraq> (last visited Mar. 4. 2010).

410. As a direct result of his exposure to the burn pits and because of their faulty design and operation, Plaintiff Cox suffers from a chronic cough and respiratory issues.

411. Plaintiff Edward Leo Ferguson is a U.S. citizen who is a permanent resident of the Commonwealth of Massachusetts, residing at 50 S. Ashburnham Road, Westminister, Massachusetts 01473.

412. Plaintiff Edward Leo Ferguson was deployed to Talil, Iraq and is currently retired as a Sergeant First Class.

413. Plaintiff Ferguson was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

414. As a direct result of his exposure to the burn pits, Plaintiff Ferguson suffers from pulmonary complications, migraine headaches, joint pains, growths in his lungs, skin rashes and chest pain.

415. Plaintiff James Warren Garland is a U.S. citizen who is a permanent resident of the Commonwealth of Massachusetts, residing at 39 Tower Hill Road, Unit 19C, Osterville, Massachusetts 02655.

416. Plaintiff James Garland served with the Army National Guard. He was deployed to Balad, Iraq from April 2003 to October 2003 and worked as a supply person for a military police battalion.

417. As a direct result of the toxins emitted by the burn pits operated by Defendants and because of their faulty design, Plaintiff Garland suffers from respiratory issues and a rare form of carcinoma.

418. Plaintiff Adam Ripka is a U.S. citizen who is a permanent resident of the Commonwealth of Massachusetts, residing at 155B Ferry Street, Easthampton, Massachusetts 01027.

419. Plaintiff Adam Ripka served in Iraq from June 2003 to April 2004. He served at several bases, including Balad Air Base, Camp Liberty and Al Asad.

420. Plaintiff Ripka was constantly exposed to the toxins emitted by burn pits designed and operated by Defendants.

421. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff Ripka suffers from acute myeloid leukemia.

**MICHIGAN**

422. Plaintiff Kevin Paul Robbins, whose address is 2258 N. Lakeshore Drive, Ludington, Michigan 49431, is a U.S. citizen who is a permanent resident of the State of Michigan.

423. Plaintiff Kevin Paul Robbins worked for KBR from February 2005 to April 2007. Among his duties, he ran the burn pit at Camp Delta in Al Kut, Iraq and helped run the pit at Camp Echo in Ad Diwaynia, Iraq. He received no training regarding the sorting of trash. He saw everything from plastic to ammunition being burned in the pits. He worked amidst constant thick, heavy smoke seven days a week while he ran the burn pit.

424. At times, the smoke was so thick from the burn pits that it interfered with the military missions. For example, on one occasion, the guards manning the guard tower were unable to see properly and ordered Plaintiff Kevin Paul Robbins to stop burning because the lack of visibility made it extremely difficult for them to do their jobs properly.

425. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff Kevin Paul Robbins suffers from rashes, sleep disorders, respiratory problems, muscle spasms, and neurological problems.

426. Plaintiff Brian Blumline, whose address is 8899 Clinton River Road, Sterling Heights, Michigan 48314, is a U.S. citizen who is a permanent resident of the State of Michigan.

427. Plaintiff Brian Blumline was deployed to Balad Air Base in Iraq as an aircraft mechanic from January 2007 to March 2007. He worked 13-hour night shifts repairing F-16s quite near the burn pit.

428. As a direct result of his exposures from the toxic emissions from the burn pit, Plaintiff Brian Blumline suffers from a persistent serious cough and throat irritation.

429. Plaintiff Robert Bidinger, whose address is 5833 Fellrath, Taylor, Michigan 48180, is a U.S. citizen who is a permanent resident of the State of Michigan.

430. Plaintiff Robert Bidinger was deployed to Balad Air Base from September 2007 to December 2007. He worked in logistical operations and his place of work was less than half a mile from the burn pit. His living quarters were less than a mile away from the burn pit. Plaintiff Bidinger worked nights, when most of the burning took place.

431. As a direct result of his exposures to the toxic emissions from the burn pit, Plaintiff Bidinger suffers from respiratory problems and is forced to take daily medications for his condition. Once an avid hockey player, he can no longer play because of his respiratory issues.

432. Plaintiff Robert Vernon Boswell, Jr., whose address is 6 St. Landry Cove , Hattiesburg, Michigan 39402, is a U.S. citizen who is a permanent resident of the State of Michigan.

433. Plaintiff Robert Vernon Boswell, Jr. was deployed to Balad Air Base, Camp Victory, Arifjan and Kandahar with the US Army.

434. Plaintiff Boswell was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants, as well as contaminated water provided by Defendants.

435. As a direct result of his exposure to the burn pits and as a direct result of his exposure to contaminated water, Plaintiff Boswell suffers from headaches, skin problems and gastrointestinal issues.

## **MINNESOTA**

436. Plaintiff Dean Guy Olson is a U.S. citizen who is a permanent resident of the State of Minnesota, residing at 1695 Cornerstone Lane SE, Owatonna, MN 55060.

437. Plaintiff Dean Guy Olson was deployed by the U.S. Army and stationed at Balad Air Base in Iraq in 2006-2007. He was constantly exposed to the hazardous emissions from the burn pit since his living and work locations were located very near the pits.

438. Plaintiff Dean Guy Olson experienced days at Balad Air Base when the smoke and fumes from the burn pits were so pervasive that soldiers and other personnel had to disable their residential smoke alarms, which were sounding in response to the heavy smoke and fumes.

439. As a direct result to his exposure to toxic emissions from the burn pits, Plaintiff Olson suffers from chronic cough, respiratory problems, throat irritations, joint pain, and skin cancer.

440. Plaintiff Shawn Burke is a U.S. citizen who is a permanent resident of the State of Minnesota, residing at 1719 Ashland Street, Hastings, MN 55033.

441. Plaintiff Shawn Burke was deployed to Balad Air Base with the U.S. Army from October 2005 to October 2006.

442. Plaintiff Burke was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

443. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff Burke suffers from neurological problems, skin issues, pulmonary complications, fatigue, headaches, and muscle and ligament issues.

444. Plaintiff Jessica Ann Daniels is a U.S. citizen who is a permanent resident of the State of Minnesota, residing at 428 North 23<sup>rd</sup> Avenue West, Duluth, MN 55806.

445. Plaintiff Jessica Ann Daniels was deployed to Balad Air Base from 2003-2004.

446. Plaintiff Daniels was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

447. As a direct result of her exposure to the burn pits, Plaintiff Daniels suffers from chronic upper respiratory problems and chronic bronchitis.

448. Plaintiff Carrie Anne Hanson is a U.S. citizen who is a permanent resident of the State of Minnesota, residing at 2700 West 44<sup>th</sup> Street, #213, Minneapolis, Minnesota 55410.

449. Plaintiff Carrie Anne Hanson was deployed to Balad Air Base from August 2007 to July 2008.

450. Plaintiff Hanson was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

451. As a direct result of her exposure to the burn pits, Plaintiff Hanson suffers from pulmonary problems, fatigue, headaches and skin rashes.

452. Plaintiff Justin Scott Hackett is a U.S. citizen who is a permanent resident of the State of Minnesota, residing at 9260 Town Hall Road, NE, Sauk Rapids, Minnesota 56379.

453. Plaintiff Justin Scott Hackett was deployed at Balad Air Base from August 2007 to July 2008. During his deployment, Plaintiff Justin Scott Hackett was constantly exposed to hazardous toxins emitted by burn pits designed and operated by Defendants.

454. As a direct result of his exposure to the burn pits, he suffers from chronic sinusitis, migraine headaches, kidney function problems and pulmonary problems.

455. Plaintiff Joel Leon Kozlowski is a U.S. citizen who is a permanent resident of the State of Minnesota, residing at 822 South Garden Street, Lake City, MN 55041.

456. Plaintiff Joel Leon Kozlowski was deployed to Balad Air Base and Basra with the U.S. Army.

457. Plaintiff Kozlowski was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

458. As a direct result of his exposure to the burn pits, Plaintiff Kozlowski suffers from pulmonary problems, fatigue, headaches and sleep disturbances.

## **MISSISSIPPI**

459. Plaintiff Kenneth Harris is a U.S. citizen who is a permanent resident of the State of Mississippi, residing at 1705 Short 3rd Avenue North, Columbus, Mississippi 39701.

460. Plaintiff Kenneth Harris was deployed to Tikrit with the Army from January 2003 to March 2004. He drove heavy machinery to and from the convoys and also served as a guard.

461. Plaintiff Harris was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

462. As a direct result of his exposure to the burn pits designed and operated by Defendants, Plaintiff Harris suffers from a skin rash, fatigue, pulmonary complications and sleeping issues.

463. Plaintiff Anthony Jerome Williams is a U.S. citizen who is a permanent resident of the State of Mississippi, residing at 15 Red Oak Drive, Petal, Mississippi 39465.

464. Plaintiff Anthony Williams was deployed to Balad Air Base from December 2003 to May 2006 with ITT Systems Division.

465. Plaintiff Williams was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

466. As a direct result of his exposure to the burn pits designed and operated by Defendants, Plaintiff Williams suffers from chest tightness, pulmonary problems, sleeping issues, joint pain and swelling, migraines, allergies and constant fevers.

467. Plaintiff Kathy Vines is a U.S. citizen who is a permanent resident of the State of Mississippi, residing at 21 Old Place Road, Columbia, Mississippi 39429.

468. Plaintiff Kathy Vines was deployed with the Columbia, Mississippi National Guard in February 2003 to 2004. She was at Balad Air Base and Al Asad.

469. Plaintiff Vines was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

470. As a direct result of her exposure to the burn pits designed and operated by Defendants, Plaintiff Vines suffers from depression, fibromyalgia, pigmented keratosis, COPD, bronchitis and sleep apnea.

**MISSOURI**

471. Plaintiff Albert Paul Bittel III, whose address is 25321 FR 2265, Golden, MO 65658, is a U.S. citizen who is a permanent resident of the State of Missouri.

472. Plaintiff Albert Paul Bittel III was deployed by the U.S. Army with the 110<sup>th</sup> Engineering Battalion and stationed at Balad Air Base in Iraq in 2006, where he was exposed to the toxic emissions from the burn pit. Plaintiff Bittel was a squad leader, and observed many of his soldiers suffering from persistent cough.

473. As a direct result of his exposure to toxic emissions from the burn pit, Plaintiff Bittel suffers from memory problem, chronic numbing and swelling of his feet and hands, breathing problems such as tightness in his chest and a cough, and cancer (seminoma). Due to Defendants' misconduct, Plaintiff Bittel has been forced to undergo surgical removal of the testicles, radiation therapy, and chemotherapy. Due to Defendants' misconduct, Plaintiff was forced to end his military career.

474. Plaintiff Jerry Lee Gordon, whose address is 7515 NW Moore Drive, Parkville, MO 64152, is a U.S. citizen, who is a permanent resident of the State of Missouri.

475. Plaintiff Jerry Lee Gordon was deployed to Afghanistan from January 2003 to September 2003. Plaintiff Gordon was constantly exposed to toxic emissions from the burn pits designed and operated by Defendants.

476. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff Gordon suffers from pulmonary problems, asthma, chronic sinusitis, a spot on his lung and sleep apnea.

477. Plaintiff George William Mayes, Jr., whose address is 5048 Greenwood Drive, Merriam Woods, MO 65740 is a U.S. citizen, who is a permanent resident of the State of Missouri.

478. Plaintiff George William Mayes, Jr. was deployed from January 2004 to December 2004. He was at Camp Arifjan, Balad Air Base, Tikrit and Kandahar as an aircraft mechanic. Plaintiff Mayes was constantly exposed to toxic emissions from the burn pits designed and operated by Defendants.

479. As a direct result of his exposure to toxic emissions from the burn pits, Plaintiff Mayes suffers from asthma, chronic laryngitis, chronic sinusitis, nasal polyps and sleep disturbances.

480. Plaintiff William Timothy Wymore, whose address is 116 Shirewood Drive, St. Charles, MO 63303, is a U.S. citizen, who is a permanent resident of the State of Missouri.

481. Plaintiff William Timothy Wymore was deployed to Balad Air Base from August 2004 to March 2005 with the United States Air Force. Plaintiff Wymore was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants, as well as the contaminated water provided by Defendants.

482. As a direct result of his exposure to the burn pits and to contaminated water, Plaintiff Wymore suffers from pulmonary problems, sleep apnea, vision problems, gastrointestinal problems, fatigue, Barrett's esophagus, short term memory loss and headaches.

**NEVADA**

483. Plaintiff Heinz Alex Disch is a U.S. citizen who is a permanent resident of the State of Nevada.

484. Plaintiff Heinz Alex Disch deployed to Balad Air Base from October 2007 to February 2008. He worked for a weather forecasting unit. Plaintiff Disch was constantly exposed to toxic emissions from the burn pits designed and operated by Defendants.

485. As a direct result of his exposure to the burn pits, Plaintiff Disch suffers from pulmonary complications, intense headaches and insomnia.

486. Plaintiff James McCollem is a U.S. citizen who is a permanent resident of the State of Nevada.

487. Plaintiff James McCollem deployed to Balad Air Base from February 2004 to February 2005 with the Missouri National Guard. Plaintiff McCollem was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

488. As a direct result of his exposure to the burn pits designed and operated by Defendants, Plaintiff McCollem suffers from chronic obstructive pulmonary disease.

489. Plaintiff Travis Fidell Pugh is a U.S. citizen who is a permanent resident of the State of Nevada.

490. Plaintiff Travis Fidell Pugh deployed to Balad Air Base twice. He went to Balad from January 2004 to January 2005 and again from October 2005 to October 2006. He worked in Information Systems. Plaintiff Pugh was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants, as well as the contaminated water provided by Defendants.

491. As a direct result of his exposure to the burn pits designed and operated by Defendants and as direct result of the contaminated water provided by Defendants, Plaintiff Pugh suffers from asthma, sleep apnea and gastrointestinal problems.

492. Plaintiff Yonel Dorelis is a U.S. citizen who is a permanent resident of the State of Nevada.

493. Plaintiff Yonel Dorelis was deployed with the Air Force as a helicopter pilot. He was deployed to Balad Air Base five times between March 2004 and September 2009. Plaintiff Dorelis was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

494. As a direct result of his exposure to the burn pits designed and operated by Defendants, Plaintiff Dorelis suffers from a chronic cough and restrictive airway disease.

#### **NEW JERSEY**

495. Plaintiff Richard McAndrew is a U.S. citizen who is a permanent resident of the State of New Jersey, residing at 110 Chelsea Place, Mt. Laurel, New Jersey 08054.

496. Plaintiff Richard McAndrew was stationed at Balad Air Base from September 2007 to June 2008. Plaintiff McAndrew was constantly exposed to the toxic emissions from the burn pits designed and operated by Defendants.

497. As a result of his exposure to the toxic emissions from the burn pits, Plaintiff McAndrew suffered and suffers from vomiting, sores, respiratory problems, headaches and tumors.

498. Plaintiff Lorenzo Perez is a U.S. citizen who is a permanent resident of the State of New Jersey, residing at 6319 Kennedy Boulevard, North Bergen, New Jersey, 07047.

499. Plaintiff Lorenzo Perez was deployed to Camp Bucca from September 2008 to May 2009. Plaintiff Lorenzo Perez was constantly exposed to the toxic emissions from the burn pits designed and operated by Defendants.

500. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff Perez suffers from fevers, vomiting, and pulmonary complications.

## **NEW MEXICO**

501. Plaintiff Jessey Joseph Philip Baca is a U.S. citizen who is a permanent resident of the State of New Mexico, residing at 2212 El Navajo SW Albuquerque, New Mexico 87105.

502. Plaintiff Jessey Joseph Philip Baca was deployed to Iraq twice. First, he was deployed from May 2004 to September 2004 with the Montana Air National Guard to Balad Air Base. Second, he was deployed from October 2007 to February 2008 with the New Mexico Air National Guard to Balad Air Base.

503. Plaintiff Baca served both times as an avionics superintendent in charge of the maintenance of F-16s.

504. The burn pits were directly across from the runways where Plaintiff Baca worked. He was constantly exposed to the harmful toxins emitted from the burn pits operated by Defendants and was harmed because of their faulty design and operation.

505. As a direct result of his exposure to the burn pits, Plaintiff Baca has experienced inflammation in his eyes, chronic cough, high fevers, trouble breathing, shortness of breath, basil cell carcinoma, severe kidney blockage and tumors in his neck and hand.

506. Plaintiff Daniel Tijerina is a U.S. citizen who is a permanent resident of the State of New Mexico, residing at 2713 Dia Caballero Del Sur, Santa Fe, New Mexico 87505.

507. Plaintiff Daniel Tijerina was deployed to Camp Victory, Baghdad from November 2004 to June 2005. He worked as a Chief Technical Officer in Knowledge Management.

508. As a direct result of his exposure to the hazardous toxins emitted by the pits operated by Defendants and because of their faulty design and operation, Plaintiff Tijerina developed breathing problems, sleep apnea, fatigue, an ongoing staph infection, asthma and a chronic cough. He requires an oxygen machine every night and uses an inhaler.

#### **NEW YORK**

509. Plaintiff Fred Robert Atkinson, Jr. is a U.S. citizen who is a permanent resident of the State of New York, residing at 19 Kennedy Ave., Plattsburgh, NY 12901.

510. Plaintiff Fred Robert Atkinson, Jr. was stationed at Al Qayyarah, Iraq at Forward Operating Base Q-West from August 1, 2007 through May 2, 2008. Plaintiff Atkinson worked at the Ammunition Supply Point which was within 1/2 mile from the Forward Operating Base burn pit operated by Defendants. Plaintiff Atkinson was regularly exposed to the toxic emissions from the burn pits.

511. As a direct result of his exposure to the toxic emissions from the burn pits in Iraq, Plaintiff Atkinson suffers chronic throat irritation, chronic cough, allergies, asthma and other respiratory conditions.

512. Jennifer Montijo is a U.S. citizen who is a permanent resident of the State of New York, residing at 133 Central Street, Watertown, NY 13601.

513. Plaintiff Jennifer Montijo was stationed in Iraq from October 2007 to November 2008 and was deployed at Speicher and Balad. Plaintiff Montijo was regularly exposed to the toxic emissions from the burn pits.

514. As a direct result of her exposure to the toxic emissions from the burn pits in Iraq, Plaintiff Montijo suffers from restrictive airways disease. Plaintiff Montijo is forced to use an inhaler in order to exercise.

515. Steven A. Flowers is a U.S. citizen who is a permanent resident of the State of New York. He is presently deployed, and may be reached at PSC 103 Box 213 APO AE 09603.

516. Plaintiff Steven A. Flowers was deployed to Camp Bucca and LSA Adder/Tallil AB I. Plaintiff Flowers was regularly exposed to the toxic emissions from burn pits.

517. As a direct result of exposure to the toxic emissions from the burn pits in Iraq, Plaintiff Flowers suffers from chronic respiratory symptoms, decreased lung capacity, sleep apnea, and experiences an excessive phlegm buildup in his chest, lungs and nose during the night. Plaintiff Flowers literally vomits this buildup in order to breathe properly.

518. Plaintiff Robyn Sachs, personal representative of Christopher J. Sachs, deceased, is a U.S. citizen who is a permanent resident of the State of New York, residing at 258 Villa Avenue, Buffalo, NY 14216.

519. Decedent Christopher J. Sachs served in the United States Military in Iraq at Tikrit, Iraq, Balad Air Base, Iraq, FOB Speicher, Iraq, Hadithah Dam, Iraq, Samarra, and Beiji Iraq. As a direct result of exposure to the toxic emissions from the burn pits in Iraq, Christopher J. Sachs died from acute myeloid leukemia on November 2, 2008.

520. Plaintiff Robyn Sachs is the surviving spouse and personal representative of decedent Christopher J. Sachs. Christopher J. Sachs is survived by no minor children.

521. Decedent Christopher J. Sachs died testate on November 2, 2008. Plaintiff Robyn Sachs was appointed executor of his estate by the New York State Surrogate's Court.

522. Alexander Hochheimer is a U.S. citizen who is a permanent resident of the State of New York, residing at 24504 First Street, Carthage, NY 13619.

523. Plaintiff Alexander Hochheimer was deployed to Iraq for nine months from October 2003 to July 2003 at Baghdad International Airport. He also deployed to Iraq for 15 months from July 2007 to September 2008 to Balad Air Base, Taji, and Baghdad International Airport.

524. Plaintiff Hochheimer was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

525. As a direct result of his exposure to the burn pits, Plaintiff Hochheimer suffers from cardiac issues, sleeping disorder and infertility. He was also hospitalized with severe pneumonia while on leave from Iraq in February 2008.

526. Richard Roopnarine is U.S. citizen who is a permanent resident of the State of New York, residing at 10723 112<sup>th</sup> Street, Richmond Hill, NY 11419.

527. Plaintiff Richard Roopnarine was deployed to Balad Air Base from August 2007 to February 2008 with the United States Air Force. Plaintiff Roopnarine was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants, as well as the contaminated water provided by Defendants.

528. As a direct result of his exposure to the burn pits and contaminated water, Plaintiff Roopnarine suffers from pulmonary complications and gastrointestinal issues.

529. Plaintiff Lawrence Shepard is a U.S. citizen who is a permanent resident of the State of New York, residing at 4333 Meads Creek Road, Painted Post, NY 14870.

530. Plaintiff Lawrence K. Shepard was deployed to Kirkuk from May 2005 to September 2005 and to Balad Air Base from January 2007 to May 2007. Plaintiff Shepard was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

531. As a direct result of his exposure to the burn pits, Plaintiff Shepard suffers from pulmonary problems, sleep apnea and asthma. He uses a mechanized form of breathing therapy known as continuous airway pressure (“CPAP”) in order to sleep.

532. Plaintiff Robert Weis is a U.S. citizen who is a permanent resident of the State of New York, residing at 4 Sunset Street, Hampton Bays, NY 11946.

533. Plaintiff Robert Weis was deployed to Camp Speicher from April 2004 to September 2004. Plaintiff Weis was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

534. As a direct result of his exposure to the burn pits and contaminated water, Plaintiff Weis suffers pulmonary problems.

#### **NORTH CAROLINA**

535. Plaintiff James Morgan is a U.S. citizen who is a permanent resident of the State of North Carolina, residing at 2812 Findley Road, Statesville, Iredell County, North Carolina.

536. Plaintiff James Morgan was deployed to Balad Air Base in Iraq and was stationed as a guard in the guard tower located directly above the burn pit designed and operated by Defendants. As a result he was exposed to constant smoke, fumes and haze

in large quantities. At times the guard tower would fill with smoke and the soldiers would have to abandon the post because they could not see or breathe through the smoke.

537. As a direct result of his exposure to toxic emissions from the bum pit, Plaintiff Morgan suffers from chronic cough, respiratory problems, lung and back cancer.

538. Plaintiff David Newton is a U.S. citizen who is a permanent resident of the State of North Carolina, residing at 1119 Riverside Circle, Spring Lake, Cumberland County, North Carolina.

539. Plaintiff David Newton was deployed to Balad Air Base in Iraq and was exposed to hazardous substances from the burn pits during his deployment. As a direct result of his exposures to the toxic emissions from the bum pit, Plaintiff Newton suffers from asthma, reactive airway disease, chronic cough with bloody and black expectorant and frequent vomiting from the accumulation of mucous.

540. Plaintiff Chris Boggiano is a U.S. citizen who is a permanent resident of the State of North Carolina, residing at 8720 Camberly Rd, Huntersville, Mecklenberg County, North Carolina.

541. Plaintiff Chris Boggiano was deployed to two Forward Operating Bases in Baqubah, Iraq . During his deployment, he was exposed to toxic emissions from burn pits designed and operated by Defendants. As a direct result of exposures to toxic emissions from the burn pit, Plaintiff Boggiano suffers serious respiratory complications and breathing problems including chronic shortness of breath.

542. Plaintiff Earl Chavis is a U.S. citizen who is a permanent resident of the State of North Carolina, residing at 379 Reddie Lane, Pembroke, Robeson County, North Carolina.

543. Plaintiff Earl Chavis was employed by KBR in Iraq at Balad Air Base. As a truck driver he would regularly pass the burn pits and the cab of his truck would fill with smoke. As a direct result of exposures to the toxic emissions from the burn pit, Plaintiff Chavis suffers from respiratory problems, asthma, restrictive airways disease, sleep disorder, migraine headaches, weight loss and joint pain.

544. Plaintiff Benny Lyle Reynolds, Jr. is a U.S. citizen who is a permanent resident of the State of North Carolina, residing at 2 Arnhem Way, Fort Bragg, Cumberland County, North Carolina.

545. Plaintiff Benny Lyle Reynolds, Jr. was deployed to Iraq, including to Al Taquaddum, where he was exposed to smoke and hazardous substances from the burn pits designed and operated by Defendants.

546. As a direct result of his exposures to the toxic emissions from the burn pits, Plaintiff Reynolds suffers from upper respiratory problems including pneumonia, constant coughing, bronchial spasms, shortness of breath, sinus problems, asthma and sleep apnea.

547. Plaintiff Joanne Ochs is the personal representative of Steven Ochs who died a resident of the State of North Carolina. Joanne Ochs resides at 138 W. French Avenue, Burnside Kentucky 42519.

548. Decedent Steven Ochs, who is represented by his surviving spouse Melissa Ochs and his personal representative, Joanne Ochs, was deployed to Iraq and Afghanistan. During his deployments, he was exposed to toxic emissions from the burn pits designed and operated by Defendants. As a direct result of his exposures to the toxic

emissions from the burn pits, Steven Debs became seriously ill with cancer, severe congestion, sinus problems and other illnesses, and died on July 12, 2008.

549. Decedent, Steven Ochs, is survived by his surviving spouse, Melissa Ochs, and his minor child, Annelise Ochs.

550. Plaintiff Joanne Ochs, mother of Steven Ochs has filed to be named as personal representative of Steven Ochs, deceased in North Carolina for purposes of maintaining a wrongful death action under N.C.G.S. 28A-18-2.

551. Stacey Pennington, Plaintiff Ochs' sister, stated in Congressional testimony, "Doctors at Duke [University] said his aggressive form of AML [acute myeloid leukemia] was definitely caused chemically and like Steve both agreed it was due to the exposures he experienced while in Iraq and Afghanistan." *VA/DOD Response to Certain Military Exposures. Before the U.S. Senate Committee on Veterans' Affairs*, 111<sup>th</sup> Cong. (2009) (statement of Stacy Pennington, Sister of Ssg. Steven Gregory Ochs, Iraqi Operation Freedom and Operation Enduring Freedom Veteran)

552. Plaintiff Thomas Jesso is a U.S. citizen who is a permanent resident of the State of North Carolina, residing at 144C Witten Circle, Havelock, North Carolina 28532.

553. Plaintiff Thomas Jesso was deployed to Al Asad from February 2008 to June 2008.

554. Plaintiff Jesso was constantly exposed to toxic emissions from the burn pits designed and operated by Defendants.

555. As a direct result of his exposure to the burn pits, Plaintiff Jesso suffers from respiratory problems.

556. Plaintiff John Joseph Reilly, Jr. is a citizen who is a permanent resident of the State of North Carolina, residing at 910 Magnolia Drive, Aberdeen, North Carolina 28315.

557. Plaintiff John Joseph Reilly, Jr. has been deployed since 2004. He has served at several bases, including Balad Air Base, Al Taqaddum, Camp Victory, Fallujah and Al Asad.

558. Plaintiff Reilly was constantly exposed to the toxic emissions from burn pits designed and operated by Defendants.

559. As a direct result of his exposure to the burn pits, Plaintiff Reilly suffers from a host of medical problems, including respiratory issues.

560. Plaintiff Napoleon Deon Thompson is a U.S. citizen who is a permanent resident of the State of North Carolina, residing at 4002 Providence Road, Charlotte, NC 28211.

561. Plaintiff Napoleon Deon Thompson was in the military from 2003-2004 and worked for KBR between 2006 and 2007. He was deployed to Taji, Mosul and Balad Air Base.

562. Plaintiff Thompson was constantly exposed to toxic emissions from burn pits designed and operated by Defendants.

563. As a direct result of his exposure to the burn pits, Plaintiff Thompson suffers from Hodgkin's lymphoma. He has been forced to undergo a bone marrow transplant, chemotherapy, and radiation.

564. Plaintiff Elizabeth Ann Hilpert is a U.S. citizen who is a permanent resident of the State of North Carolina, residing at 4203 Sweetwater Drive, Fayetteville, North Carolina 28311.

565. Plaintiff Elizabeth Ann Hilpert was deployed to Iraq from 2007 to 2008. She was at Camp Speicher, Baghdad and Taqaddum with LSI.

566. Plaintiff Hilbert was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

567. As a direct result of her exposure to the burn pits, Plaintiff Hilpert suffers from pulmonary complications, chronic coughing, joint pain, memory loss, fatigue, chemical sensitivity and frequent headaches.

568. Plaintiff Eric Ralph Nicastro is a U.S. citizen who is a permanent resident of the State of North Carolina, residing at 1928 Conifer Circle, Charlotte, North Carolina 28213.

569. Plaintiff Eric Ralph Nicastro was deployed to Bagram from August 2008 to December 2008.

570. Plaintiff Nicastro was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants, as well as the contaminated water provided by Defendants.

571. As a direct result of his exposure to the burn pits and to contaminated water, Plaintiff Nicastro suffers from respiratory and gastrointestinal problems.

572. Plaintiff Tony Terrel Curtis is a U.S. citizen who is a permanent resident of the State of North Carolina, residing at 5900 End Place, Fayetteville, North Carolina 28314.

573. Plaintiff Tony Terrel Curtis was deployed to Iraq from January 2004 to May 2006 with Titan Corporation. He was at Balad Air Base, Camp Falcon and Kirkuk.

574. Plaintiff Curtis was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

575. As a direct result of his exposure to the burn pits, Plaintiff Curtis suffers from respiratory problems and skin rashes.

576. Plaintiff Joseph John Ripley, Jr. is a U.S. citizen who is a permanent resident of the State of North Carolina, residing at 11 Kingwood Circle, Franklin, North Carolina 28734-9748.

577. Plaintiff Joseph John Ripley, Jr. was deployed from October 2008 to June 2009. He spent time at COP Meade, Camp Striker, Camp Liberty and Camp Victory.

578. Plaintiff Ripley was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

579. As a direct result of his exposure to the burn pits, Plaintiff Ripley suffers from respiratory problems.

580. Plaintiff Leonard Everett White is a U.S. citizen who is a permanent resident of the State of North Carolina, residing at 513 Glen Canyon Drive, Fayetteville, North Carolina 28303-3218.

581. Plaintiff Leonard E. White was deployed to Balad Air Base, where he is currently working for L-3 Communications.

582. Plaintiff White was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

583. As a direct result of his exposure to the burn pits, Plaintiff White suffers from respiratory issues, sleep disturbances, and fatigue. He also suffers from headaches, pulmonary problems, shortness of breath, restrictive airways and a reduced ability to speak. Additionally, he experiences chronic cough with mucus, and pain in his lower back and neck.

584. Plaintiff Edward Paul Corcoran is a U.S. citizen who is a permanent resident of the State of North Carolina, residing at 1532 Crag Burn Lane, Raleigh, North Carolina 27604.

585. Plaintiff Edward Paul Corcoran was deployed to Balad Air Base.

586. Plaintiff Corcoran was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants, as well as the contaminated water provided by Defendants.

587. As a direct result of his exposure to the burn pits and to contaminated water, Plaintiff Corcoran suffers from headaches, gastrointestinal issues and pulmonary problems.

## **NORTH DAKOTA**

588. Plaintiff Patrick Cassidy is a U.S. citizen who is a permanent resident of the State of North Dakota, residing at 3508 19th Street South, Fargo, North Dakota 58104.

589. Plaintiff Patrick Cassidy was deployed to Balad Air Base from February 2004 to December 2004.

590. Plaintiff Cassidy was constantly exposed to the harmful toxins emitted from the burn pits designed and operated by Defendants.

591. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff Cassidy suffered from pneumonia and continues to suffer from pulmonary complications.

592. Plaintiff William Barry Dutton is a U.S. citizen who is a permanent resident of the State of North Dakota, residing at 4929 Mellowson Drive, Bismarck, North Dakota 58503.

593. Plaintiff William Barry Dutton was deployed to Iraq from April 2003 to April 2004 with North Dakota National Guard's 142 Engineer Combat Heavy at Balad Air Base.

594. Plaintiff Dutton served as a combat medic.

595. During his deployment, Plaintiff Dutton was exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants. He was also exposed to the contaminated water provided by them.

596. As a direct result of his exposure to the toxic emissions from the burn pits, and as a direct result of his exposure to contaminated water, Plaintiff Dutton suffers from constant joint pain, memory loss, migraines, digestive issues, skin rashes, open sores and breathing problems.

597. Plaintiff Christopher Michael Kozel is a U.S. citizen who is a permanent resident of the State of North Dakota, residing at 55 Dundee Drive, Apartment 2, Minot AFB, North Dakota 58707.

598. Plaintiff Christopher Michael Kozel was stationed at Balad Air Base from September 2008 to December 2008 with the Army.

599. As a direct result of his exposure to the toxins emitted by the burn pits designed and operated by Defendants, Plaintiff Kozel suffers from lymphoma. As a result of Defendants' misconduct, Plaintiff Kozel has been forced to undergo chemotherapy.

600. Plaintiff Larry Aberle is a U.S. citizen who is a permanent resident of the State of North Dakota, residing at 702 3<sup>rd</sup> Street East, West Fargo, North Dakota 58078.

601. Plaintiff Larry Aberle was deployed to Iraq from May 2003 to March 2004. He worked as a truck driver at Abu Ghraib and Balad Air Base with the 142<sup>nd</sup> Engineer Battalion.

602. Plaintiff Aberle was constantly exposed to the toxins emitted from burn pits designed and operated by Defendants.

603. As a direct result of his exposure to the burn pits and because of their faulty design, Plaintiff Aberle suffers from pulmonary complications and memory loss.

## **OHIO**

604. Plaintiff Benjamin Boeke, whose address is 3944 Genteel Drive, Grove City, Ohio 43123, is a U.S. citizen who is a permanent resident of the State of Ohio.

605. Plaintiff Benjamin Boeke was stationed at Balad Air Base in Iraq as a biomedical equipment technician from August 2005 to January 2006. While there, he was exposed to thick black smoke and toxic fumes from the burn pit designed and operated by Defendants. He suffers from severe allergies, reactive airway disease, and a neurological disorder characterized, in his case, by persistent shaking of the head and hands. He is also forced to use an inhaler on a routine basis.

606. Plaintiff Craig Kervin, whose address is 15470 Ovitz Road, Perrysburg, Ohio 43551, is a U.S. citizen who is a permanent resident of the State of Ohio.

607. Plaintiff Craig Kervin was stationed at Balad Air Base in Iraq as a United States Air Force jet engine mechanic from May 2007 to July 2007. While there, he was exposed to the toxic smoke and fumes from the burn pit designed and operated by Defendants. Plaintiff Kervin suffers from environmentally-induced asthma, chronic fatigue, blurred vision and slurred speech.

608. Plaintiff Barry Zabelinski, whose address is 1840 Rhodes Road, Apt. 555E, Kent, Ohio 44240, is a U.S. citizen who is a permanent resident of the State of Ohio.

609. Plaintiff Barry Zabelinski was stationed at Camp Bucca in Iraq from August 2005 to June 15, 2006. He was a mental health liaison responsible for the morale and welfare of the American soldiers. While there, he was exposed to the toxic smoke and fumes from the burn pit designed and operated by Defendants. He suffers from chronic sinusitis and upper respiratory problems, which have been unresponsive to aggressive anti-biotic medication, breathing difficulties, Bells Palsy, a viral paralysis which has been treated with prednisone, and physiologic tremors in his hands.

610. Plaintiff Joshua Barber, whose address is 873 Madison Avenue, Chillicothe, Ohio 45601, is a U.S. citizen who is a permanent resident of the State of Ohio.

611. Plaintiff Joshua Barber was deployed to Iraq from August 2005 to June 2006, working for a company called MPRI.

612. Plaintiff Barber was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

613. As a direct result of his exposure to the burn pits, Plaintiff Barber suffers from acute myeloid leukemia. As a result of Defendants' misconduct, Plaintiff Barber has been forced to undergo chemotherapy.

614. Plaintiff Boyd Chet Lewis, whose address is 7779 Lemay Street, Waynesville, Ohio 45068, is a U.S. citizen who is a permanent resident of the State of Ohio.

615. Plaintiff Boyd Chet Lewis was deployed to Balad Air Base from June 2006 to November 2006, working with the Defense Contract Management Agency.

616. Plaintiff Lewis was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

617. As a direct result of his exposure to the burn pits, Plaintiff Lewis suffers from pericarditis, pulmonary complications and neuropathy.

#### **OKLAHOMA**

618. Plaintiff David Green, whose address is 29 H. Street, NW, Miami, Oklahoma 74354, is a U.S. citizen who is a permanent resident of the State of Oklahoma.

619. Plaintiff David Green was stationed at Balad Air Base in Iraq as a combat medic and door gunner from December 2005 to December 2006. While there, he was exposed to thick black smoke and toxic fumes from the burn pit. He has developed two inoperable brain tumors. He has also developed numbness, tingling in his arms and hands, migraines, a vision deficit, vertical and horizontal nystagmus, photophobia, memory loss, facial droop, loss of taste, breathing difficulties, a decrease in bowel and

bladder function, and severe back and shoulder pain that continue to the present. He is also suffering from depression.

620. Plaintiff Nick Daniel Heisler, whose address is 419 N.E. 46th Street Lawton, Oklahoma 73507, is a U.S. citizen who is a permanent resident of the State of Oklahoma.

621. Plaintiff Nick Daniel Heisler was deployed to Iraq twice, once from February 2003 to February 2004 and again from September 2004 to September 2005. During his first deployment, he was mostly at Balad Air Base where he worked at a distribution center. He described the burn pit as burning throughout the night. His living and working quarters were less than a mile away from the burn pit. He had no prior health problems prior to his first deployment and was an avid runner. He developed gastrointestinal problems while in Iraq, and in January of 2007, he was diagnosed with restrictive pericarditis. He subsequently underwent open heart surgery and the pericardial sac was removed from his heart. He can no longer run and must take medicine for high blood pressure.

622. Plaintiff Wesley DeWayne Parker, whose address is PO Box 43, Bennington, Oklahoma 74723, is a U.S. citizen who is a permanent resident of the State of Oklahoma.

623. Plaintiff Wesley DeWayne Parker was deployed to Kandahar, Afghanistan in 2004 with the United States Army.

624. Plaintiff Parker was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants and to the contaminated water provided by Defendants.

625. As a direct result of his exposure to the burn pits and contaminated water, Plaintiff Parker suffers from pulmonary complications, neurological problems, intestinal issues, insomnia, migraines, skin lesions and tumors.

## **OREGON**

626. Plaintiff Lisa Rounds and Plaintiff David Rounds, personal representatives of Andrew Rounds, deceased, are U.S. citizens who are permanent residents of the State of Oregon. Their address is 39400 Gross Street, Lebanon, Oregon 97355.

627. Plaintiff's decedent, Spc. Andrew Ray Rounds, served in the United States Army for approximately three years. He spent fourteen consecutive months in Iraq, positioned in and around Kirkuk.

628. Spc. Rounds was regularly exposed to the toxic emissions from the burn pits. As a direct result of his exposure to the toxic emissions from the burn pits in Iraq, he was diagnosed with acute myelogenous leukemia in January of 2007. "By the time it was diagnosed, Andrew Rounds' leukemia had progressed so far that doctors didn't figure he'd last more than a few weeks. Ever the soldier, he fought on for nine months." Matthew D. LaPlante, *Vets: Burn pits are killing us*, The Salt Lake Tribune, at [http://www.sltrib.com/News/ci\\_14182242](http://www.sltrib.com/News/ci_14182242) (last visited Mar. 4, 2010).

629. Decedent Spc. Andrew Rounds died from acute myelogenous leukemia on October 20, 2007 at age 22.

## **PENNSYLVANIA**

630. Plaintiff Peter Blumer is a U.S. citizen who is a permanent resident and citizen of the Commonwealth of Pennsylvania, residing at 631 W. Main Street, Weatherly, Pennsylvania 18255.

631. Plaintiff Peter Blumer worked for ITT at Balad Air Base from December 2003 to June 2006.

632. Plaintiff Blumer was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants, as well as the contaminated water provided by Defendants.

633. As a direct result of his exposure to the hazardous toxins emitted by the pits operated by Defendants, and as direct result of his exposure to contaminated water, Plaintiff Blumer suffers repeated bouts of pneumonia, pulmonary complications, and digestive problems. In addition, he suffers from severe cluster and migraine headaches.

634. Plaintiff Scott Andrew Chamberlain is a U.S. citizen who is a permanent resident and citizen of the Commonwealth of Pennsylvania, residing at 1212 N. 2nd Street, Altoona, Pennsylvania 16601.

635. Plaintiff Scott Andrew Chamberlain was deployed to Balad Air Base from January 2007 to June 2007 with the 332<sup>nd</sup> Security Forces Squadron.

636. Plaintiff Chamberlain was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

637. As a direct result of his exposure to the hazardous toxins emitted by the pits operated by Defendants, Plaintiff Chamberlain suffers from migraines and sleep apnea.

638. Plaintiff Timothy E. Dimon is a U.S. citizen who is a permanent resident and citizen of the Commonwealth of Pennsylvania, residing at 822 High Street, Williamsport, Pennsylvania 17701.

639. Plaintiff Timothy E. Dimon was deployed to Balad Air Base from June 2007 to December 2007 with the 732<sup>nd</sup> Air Expeditionary Support Group.

640. Plaintiff Dimon was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants, as well as contaminated water provided by Defendants.

641. As a direct result of his exposure to the hazardous toxins emitted by the pits operated by Defendants, and as a direct result of his exposure to contaminated water provided by Defendants, Plaintiff Dimon suffers from myocardial diffusion, asthma and intestinal issues.

642. Plaintiff William Philip Krawczyk, Sr. is a U.S. citizen who is a permanent resident and citizen of the Commonwealth of Pennsylvania, residing at 4001 Bird Drive, Erie, Pennsylvania 16510.

643. Plaintiff William Philip Krawczyk, Sr. was deployed to Balad Air Base from January 2005 to January 2006.

644. Plaintiff Krawczyk was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

645. As a direct result of his exposure to the hazardous toxins emitted by the pits operated by Defendants and because of their faulty design and operation, Plaintiff Krawczyk suffers from a degenerative tissue disease and pulmonary complications.

646. Plaintiff Norman Madsen is a U.S. citizen who is a permanent resident and citizen of the Commonwealth of Pennsylvania, residing at 2050 E. Sanger Street, Philadelphia, Pennsylvania 19124.

647. Plaintiff Norman Madsen was deployed to Al Ramadi from 2005 to 2006.

648. Plaintiff Madsen was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

649. As a direct result of his exposure to the burn pits and because of their faulty design and operation, Plaintiff Madsen suffers from throat cancer. As a result of Defendants' misconduct, Plaintiff Madsen has been forced to undergo radiation.

### **SOUTH CAROLINA**

650. Plaintiff Derrol A. Turner is a U.S. citizen who is a permanent resident of the State of South Carolina, residing at 180 Bridge Creek Drive, Goose Creek, SC 29445 5213.

651. Plaintiff Derrol A. Turner was deployed to Balad Air Base, Iraq as well as Prince Sultan Airbase, Saudi Arabia, Bagram Air Base, Afghanistan and Al Udeid Airbase, Qatar. He was constantly exposed to the hazardous emissions from the burn pits operated by Defendants. While stationed at Balad Air Base, for example, his work station was located within one-quarter mile of the burn pit, and he was exposed to toxic smoke and fumes constantly.

652. As a direct result of his exposure to toxic emissions from the burn pits, Plaintiff Derrol A. Turner suffers from seven masses and nodules in his right lung, scarring in his left lung, reduced lung capacity, and chronic coughing.

653. Plaintiff Vincent C. Moseley is a U.S. citizen who is a permanent resident of the State of South Carolina, residing at 204 S. Hall Court, Summerville, SC 29483.

654. Plaintiff Vincent C. Moseley was deployed to Balad Air Base from August 2005 to December 2005 with the Air Force Reserves as an aircraft mechanic. He was

constantly exposed to the hazardous emissions from the burn pits operated by Defendants.

655. As a direct result of his exposure to toxic emissions from the burn pits, Plaintiff Vincent C. Moseley has developed hardened bronchial tubes and nodules in his lungs.

656. Plaintiff Alex Harley is a U.S. citizen who is a permanent resident of the State of South Carolina, residing at 440 Stephanie Dr., Goose Creek, SC 29445.

657. Plaintiff Alex Harley was deployed to Al Taquaddum, Iraq (Ridgeway) in 2006 and 2007.

658. As a direct result of his exposure to toxic emissions from the burn pits, Plaintiff Alex Harley suffers from shortness of breath and other breathing problems, including sinusitis, congestion, difficulty breathing, chest tightness, chronic laryngitis, double pneumonia, upper respiratory infections, and skin infections.

659. Plaintiff Jonathan Thomas Bishop is a U.S. citizen who is a permanent resident of the State of South Carolina, residing at 110 Lucy Drive, Goose Creek, SC 29445.

660. Plaintiff Jonathan Thomas Bishop was deployed to Iraq from September 2008 to July 2009, working with SAIC. Plaintiff Bishop worked at Camp Liberty and Camp Taji.

661. Plaintiff Bishop was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants, as well as contaminated water provided by Defendants.

662. As a direct result of his exposure to the burn pits and to contaminated water, Plaintiff Bishop suffers from ulcers, vomiting blood, dermatological problems, and pulmonary problems.

663. Plaintiff Shane Nathaniel Briones is a U.S. citizen who is a permanent resident of the State of South Carolina, residing at 103 Cameron Court, Goose Creek, South Carolina 29445.

664. Plaintiff Shane Briones was deployed to Iraq with the U.S. Army. Plaintiff Briones was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants, as well as the contaminated water provided by Defendants.

665. As a direct result of his exposure to the burn pits and to contaminated water, Plaintiff Briones suffers headaches, gastrointestinal illness, depression, dermatological conditions, and severe nose bleeds.

666. Plaintiff Charlene Chisholm is a U.S. citizen who is a permanent resident of the State of South Carolina, residing at 2211 Garfield St. North, Charleston, SC 29405.

667. During Plaintiff Charlene Chisholm's deployment, she was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

668. As a direct result of her exposure to the burn pits, Plaintiff Chisholm suffers from medical problems.

669. Plaintiff Harry Christopher Ertell is a U.S. citizen who is a permanent resident of the State of South Carolina, residing at 126 Lake Jogassee Drive, Summerville, SC 29845.

670. During Plaintiff Harry Christopher Ertell's deployment, he was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

671. As a direct result of his exposure to the burn pits, Plaintiff Ertell suffers from medical problems.

672. Plaintiff Annette Kerr is a U.S. citizen who is a permanent resident of the State of South Carolina, residing at 628 Cavins Road, Woodruff, SC 29388.

673. Plaintiff Annette Kerr is a former KBR employee who was deployed from December 2006 to December 2007 as a convoy driver.

674. Plaintiff Kerr was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

675. As a direct result of her exposure to the burn pits, Plaintiff Kerr suffers from medical problems.

676. Plaintiff William F. Long is a U.S. citizen who is a permanent resident of the State of South Carolina, residing at 202 Mulberry Drive, Summerville, SC 29483.

677. Plaintiff Long was deployed to Camp Liberty, Baghdad.

678. Plaintiff Long was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

679. As a direct result of his exposure to the burn pits, Plaintiff Long suffers from medical problems.

680. Plaintiff Marc McLeod is a U.S. citizen who is a permanent resident of the State of South Carolina, residing at 1 Cool Blow Street, Unit 141, Charleston, SC 29464.

681. Plaintiff Marc McLeod has been deployed since 2004. He has been at Al Asad, Al Taqaddum, Balad Air Base, Camp Liberty, Fallujah and Ramadi.

682. Plaintiff McLeod is constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

683. As a direct result of his exposure to the burn pits, Plaintiff McLeod suffers from pulmonary complications and skin rashes.

684. Plaintiff Julio Cesar Merida is a U.S. citizen who is a permanent resident of the State of South Carolina, residing at 131 Coronet Street, Summerville, SC 29483.

685. During Plaintiff Julio Cesar Merida's deployment, he was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

686. As a direct result of his exposure to the burn pits, Plaintiff Merida suffers from medical problems.

687. Plaintiff Damien D. Moore is a U.S. citizen who is a permanent resident of the State of South Carolina, residing at 105 Debbie Lane A-4, Moncks Corner, SC 29461.

688. During Plaintiff Damien Moore's deployment, he was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

689. As a direct result of his exposure to the burn pits, Plaintiff Moore suffers from medical problems.

690. Plaintiff Herman White III is a U.S. citizen who is a permanent resident of the State of South Carolina, residing at 3342 Stoneybrook Road, Charleston, SC 29420.

691. During Plaintiff Herman White III's deployment, he was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

692. As a direct result of his exposure to the burn pits, Plaintiff White suffers from medical problems.

693. Plaintiff Herbert C. Wigfall Jr. is a U.S. citizen who is a permanent resident of the State of South Carolina, residing at 322 Damascus Drive, Summerville SC 29483.

694. Plaintiff Herbert R. Wigfall Jr. was deployed in 2008 to Balad Air Base and Camp Victory.

695. During his deployment, Plaintiff Wigfall was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

696. As a direct result of his exposure to the burn pits, Plaintiff Wigfall suffers from medical problems.

#### **SOUTH DAKOTA**

697. Plaintiff Sean Johnson, whose address is 1005 N. Main Street, Aberdeen, South Dakota 57401, is a U.S. citizen who is a permanent resident of the State of South Dakota.

698. Plaintiff Sean Johnson was deployed to Balad Air Base from October 2005 to August 2006. He was in the 452<sup>nd</sup> Ordnance Company as an ammunitions inspector.

699. Plaintiff Johnson was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants, as well as the contaminated water provided by Defendants.

700. As a direct result of his exposure to the hazardous toxins emitted by the pits operated by Defendants, because of their faulty design and operation and as direct result of his exposure to contaminated water, Plaintiff Johnson suffers from pulmonary problems, stomach pains, and chronic colds.

### **TENNESSEE**

701. Plaintiff Anthony Ray Johnson is a U.S. citizen who is a permanent resident of the State of Tennessee, residing at Ft. Gordon, Georgia 30905.

702. Plaintiff Anthony Johnson was deployed twice to Iraq. From November 2004 to October 2005, he was at Ft. Caldwell, Iraq. From September 2006 to May 2008, he was at Camp Bucca.

703. At Ft. Caldwell, Plaintiff Johnson served as a mechanic on convoy missions. At Camp Bucca, Plaintiff Johnson serves as a guard.

704. Plaintiff Johnson was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

705. As a direct result of his exposure to the burn pits designed and operated by Defendants, Plaintiff Johnson has asthma, trouble breathing, migraines and a chronic cough. He must take daily medications, including an inhaler.

706. Plaintiff David Michael Rohmfeld is a U.S. citizen who is a permanent resident of the State of Tennessee, residing at 268 Audrea Lane, Clarksville, Tennessee 37042.

707. Plaintiff David Michael Rohmfeld was deployed to Kandahar and Bagram in 2003 with the Army.

708. Plaintiff Rohmfeld was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

709. As a direct result of his exposure to the burn pits designed and operated by Defendants, Plaintiff Rohmfeld was diagnosed with asthma and uses two steroid inhalers, as well as a rescue inhaler.

**TEXAS (Western District)**

710. Plaintiff Joshua Eller is a citizen of the United States, residing at 1392 Revel Cove Drive, Conyers, Georgia 30094. Mr. Eller was employed by Readiness Management Support in 2005 as a computer aided drafting technician. He was deployed to Iraq from February through November of 2006 as a CAD technician for the 332<sup>nd</sup> Air Force battalion.

711. Plaintiff Joshua Eller was deployed to Iraq in February 2006 as part of the civilian force supporting the U.S. Air Force. During his ten months in Iraq, he used the swimming pools, showering and hygiene stations and dining halls which were operated and supplied by Defendants.

712. In May 2006, Mr. Eller developed lesions on his skin, these lesions spread, filled with fluid and finally burst. The lesions wept fluid to such an extent that they had to be kept covered with gauze. After treatment with antibiotics given from the Air Force Clinic, the lesions scabbed over and healed. In August 2006, the lesions returned and a similar course and treatment were experienced.

713. Mr. Eller developed blisters on his feet beginning in August 2006 and continuing to the present time. Like the earlier lesions, the blisters swell, fill with fluid and eventually burst. The blisters make it very painful to walk and curtail most physical activity for a week. After Mr. Eller's return to the United States, he continued to experience the blistering on his feet. The condition returns every three to four months and each flare up lasts approximately one week.

714. Mr. Eller developed severe gastrointestinal problems while in Iraq. He experienced frequent vomiting, cramping and diarrhea while stationed at Balad Air Base. Since his return to the United States, Mr. Eller continues to suffer from recurring severe stomach pain and gastrointestinal problems.

715. Mr. Eller witnessed the open air burn pit in operation at Balad Air Base. On one occasion, he witnessed a wild dog running around the base with a human arm in its mouth. The human arm had been dumped on the open air burn pit by KBR. He described the event as "one of the worst things I have seen." Katie Connolly, *A Sickening Situation*, Newsweek, at <http://www.newsweek.com/id/204198> (last visited March 4, 2010).

716. Mr. Eller continues to have severe nightmares caused by this incident and is now dependent on sleeping pills to help him rest without being tormented by this image. Mr. Eller has been diagnosed with adjustment disorder as a result of his continuing nightmares.

717. Plaintiff Ken May is a citizen of the United States, residing at 1918 Dipol Courtway, Titusville, Florida 32780. Mr. May is a former employee of Defendants KBR

and Halliburton, and was deployed to Iraq from January through April of 2005 as an acting operations specialist in KBR's operations department.

718. Plaintiff Ken May was an employee of KBR from January 2005 to April 2005. He was an acting operations specialist in KBR's operations department at Camp Ar Ramadi in Iraq. In January 2005, Mr. May smelled a constant unpleasant odor emanating from the non-potable water tanks. Upon inspection in February 2005, Mr. May observed that the camp's potable water tanks were left open to the elements and unsecured. Mr. May learned in March 2005 that the water at Ar Ramadi was not properly chlorinated and contained contaminants and pathogenic organisms from the Euphrates River.

719. Mr. May was exposed to the contaminated water supplied by Defendants when he bathed, brushed his teeth, drank water and swam. In February 2005, he was nicked by a barber's razor, and washed the wound with water supplied by Defendants which ran from a tap at the camp. The wound began oozing and a persistent rash developed. Mr. May also developed irregularities in his finger nails. In addition, he experienced severe gastroenteritis, which resulted in the loss of 40 pounds of body weight.

720. In Congressional testimony in front of the Senate Democratic Policy Committee, Plaintiff May stated, "I also believe that Halliburton knows that it exposed its employees and American troops to contaminated water, and has a duty and responsibility to provide necessary testing and support. I do not believe they have done so." *An Oversight Hearing on Whether Halliburton Has Failed to Provide Clean Water to United*

*States Troops in Iraq. Before the Senate Democratic Policy Committee, 109<sup>th</sup> Cong.* (2006) (statement of Ken May, former Halliburton employee).

721. Plaintiff Scott Pennington is a citizen of the United States, residing at 804 Pecan Forest Court, Chesapeake, Virginia 23322. Mr. Pennington was deployed by the United States Army as part of a surgical team to Tarin Kowt, Afghanistan, between June 2007 and January 2008, where he worked as an anesthesiologist.

722. Plaintiff Scott Pennington was an anesthesiologist deployed by the United States Army as part of a surgical team to Tarin Kowt, Afghanistan, between June 2007 and January 2008. He was located at Forward Operating Base Ripley (later named Kamp Holland).

723. The Army field hospital at which Mr. Pennington worked was supposed to have a potable water supply at all points in the facility, but only non-potable well water was provided. During Mr. Pennington's deployment, the facility's chlorinator was broken and the water supply was replaced with contaminated river water which was not chlorinated or otherwise treated. KBR's support personnel did not inform anyone of the broken chlorinator or of the fact that all of the water supplied throughout the camp – from the dining halls to the showers to the hospital – was contaminated.

724. As a result of ingesting the contaminated water, Mr. Pennington became very ill. As the only anesthesiologist at the hospital, Mr. Pennington felt a duty to continue to work in spite of his near-death gastric condition. At one point, his fellow doctors started intravenous fluids in Mr. Pennington's veins because he could barely stand. In addition, Mr. Pennington witnessed residents at the camp become severely ill

with gastric illnesses and skin afflictions due to ingestion of and contact with the contaminated water.

725. Plaintiff Matthew Riddle is a citizen of the United States, residing at 1041 Old Mill Way, Eluerta, California 95626. He was deployed to Iraq twice with the United States Marines, once in 2003 and again in 2004. During his first deployment, he was mostly in convoys but during his second deployment, he was stationed in Al-Taqaddum.

726. Plaintiff Matthew Riddle was deployed to Iraq twice with the United States Marines in 2003 and 2004. During his first deployment, he was mostly in convoys but during his second deployment, he was stationed in Al-Taqaddum. During this time, he used the swimming pools, showering and hygiene stations and dining halls which were operated and supplied by Defendants. As a result of exposure to contaminated and improperly treated water supplied by the Defendants, Mr. Riddle developed a painful skin rash after his second deployment, which started on his stomach and spread throughout his body, erupting and bleeding. The rash was unsuccessfully treated with cortisone; it kept him from working or holding his daughter, and it contributed to his divorce.

**TEXAS (Southern District)**

727. Plaintiff Robert Cain, whose address is 330 Summer Mountain Drive, San Marcos, Texas 78666, is a U.S. citizen who is a permanent resident of the State of Texas.

728. Plaintiff Robert Cain was stationed at Balad Air Base, Camp Anaconda in Iraq. He was exposed to thick black smoke and toxic fumes from the burn pit.

729. As a direct result of his exposure to the toxic emissions from the burn pit, Plaintiff Cain suffers from a respiratory condition that continues to the present and limits his military career.

730. Plaintiff Craig Henry, whose address is 400 East Guenther, #1202, San Antonio, Texas 78210, is a U.S. citizen who is a permanent resident of the State of Texas.

731. Plaintiff Craig Henry was stationed at Balad Air Base, Camp Anaconda in Iraq. He was exposed to the toxic smoke and fumes from the burn pit.

732. As a direct result of his exposure to the toxic emissions from the burn pit, Plaintiff Henry suffers from chronic coughing and cold-like symptoms, and a respiratory condition.

733. Plaintiff Francis Jaeger, whose address is 5912 Echo Bluff Drive, Haltom City, Texas 76137, is a U.S. citizen who is a permanent resident of the State of Texas.

734. Plaintiff Francis Jaeger was stationed at Forward Operating Base Sykes in Iraq. He was exposed to the toxic smoke and fumes from the burn pit.

735. As a direct result of his exposure to the toxic emissions from the burn pit, Plaintiff Jaeger suffers from a burning sensation in his lungs, chronic respiratory infections, other respiratory conditions, sleep apnea and vision loss.

736. Plaintiff David McMenemy, whose address is 408 West 2<sup>nd</sup> Street, Lampasas, Texas 76550, is a U.S. citizen who is a permanent resident of the State of Texas.

737. Plaintiff David McMenemy was stationed at Camp Al Taji, Iraq. He was exposed to the toxic smoke and fumes from the burn pits designed and operated by Defendants.

738. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff McMenemy suffers from chronic coughing, headaches, sinus problems, acute

abdominal pains, high blood pressure, and tumors. As a result of Defendants' misconduct, he has been forced to have surgery.

739. Plaintiff Mark Posz, whose address is 9511 Millbrook, San Antonio, Texas 78245, is a U.S. citizen who is a permanent resident of the State of Texas.

740. Plaintiff Mark Posz worked as the foreman at the Ar Ramadi burn pit. He was constantly exposed to the toxic emissions from the burn pit.

741. As a direct result of his exposure to the toxic emissions, Plaintiff Posz suffers from coughing up blood and a severe respiratory condition. Plaintiff Posz suffered blisters and burns in the areas where his skin was in constant direct contact with the ash from the burn pits.

742. Plaintiff El Kevin Sar, whose address is 5807 Ettrick Drive, Houston, Texas 77035, is U.S. citizen who is a permanent resident of the State of Texas.

743. Plaintiff El Kevin Sar was stationed in Iraq and exposed to the toxic smoke and fumes from the burn pits designed and operated by Defendants.

744. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff Sar suffers from chronic coughing, headaches and cold-like symptoms, and other pulmonary problems.

745. Plaintiff Jeffrey Barr, whose address is 14019 Windy Creek, Helotes, Texas 78023, is a U.S. citizen who is a permanent resident of the State of Texas.

746. Plaintiff Jeffrey Barr was at Balad Air Base from January 2005 to May 2005 and again from January 2007 to May 2007. Plaintiff Barr was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

747. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff Barr suffers from a chronic cough, sleep apnea, and headaches.

748. Plaintiff George Christopher Campbell, whose address is 6021 Marsvillas Street, San Angelo, Texas 76904, is a U.S. citizen who is a permanent resident of the State of Texas.

749. Plaintiff George Christopher Campbell was deployed from May 2005 to July 2005 to Balad Air Base. Plaintiff Campbell was constantly exposed to the toxic emissions from the burn pits designed and operated by Defendants.

750. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff Campbell suffers from pulmonary problems, recurrent asthma attacks, chronic obstructive pulmonary disease, high blood pressure and migraines.

751. Plaintiff Chris Coleman, whose address is 5575 W. Amity, Salado, Texas 76571, is a U.S. citizen who is a permanent resident of the State of Texas.

752. Plaintiff Chris Coleman was deployed to Balad Air Base from August 2006 to August 2007. Plaintiff Coleman was constantly exposed to the toxic emissions from the burn pits designed and operated by Defendants.

753. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff Coleman suffers from respiratory problems, stomach issues and an enlarged spleen.

754. Plaintiff Adam Ellsworth, whose address is 3026 Weatherford Street, La Porte, Texas 77571, is a U.S. citizen who is a permanent resident of the State of Texas.

755. Plaintiff Adam Ellsworth was deployed to Balad Air Base from October 2006 to December 2007 as a combat medic. Plaintiff Ellsworth was constantly exposed to the toxic emissions from the burn pits designed and operated by Defendants.

756. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff Ellsworth suffers from pulmonary problems, asthma, chronic obstructive pulmonary disease, fatigue and skin rashes.

757. Plaintiff Jason Greskoviak, whose address is 408 Skyline Avenue, Apartment A, Killeen, Texas 76541, is a U.S. citizen who is a permanent resident of the State of Texas.

758. Plaintiff Jason Greskoviak was deployed from August 2006 to August 2007 to Balad Air Base. Plaintiff Greskoviak was constantly exposed to the toxic emissions from the burn pits designed and operated by Defendants.

759. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff Greskoviak suffers from sleep apnea, migraines and respiratory problems.

760. Plaintiff Eddie Hall, whose address is 101 Red Wolf Lane, Brookeland, Texas 75931, is a U.S. citizen who is a permanent resident of the State of Texas.

761. Plaintiff Eddie Hall is a former KBR employee who was at Camp Liberty and Camp Rustamiyah from January 2006 to December 2006. Plaintiff Hall was constantly exposed to the toxic emissions from the burn pits designed and operated by Defendants.

762. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff Hall suffers from respiratory problems, high blood pressure, arthritis, bronchitis, fluid in his lungs, fibromyalgia, blood clots and lupus.

763. Plaintiff Fernando Lopez, whose address is 113 Sutherland Drive, Portland, Texas 78374, is a U.S. citizen who is a permanent resident of the State of Texas.

764. Plaintiff Fernando Lopez was deployed to Camp Striker from January 2005 to December 2005. Plaintiff Lopez was constantly exposed to the toxic emissions from the burn pits designed and operated by Defendants.

765. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff Lopez suffers from sleep apnea, joint pain and pulmonary problems.

766. Plaintiff Frank Malley, whose address is 3445 Evalon, Beaumont, Texas 77706, is a U.S. citizen who is a permanent resident of the State of Texas.

767. Plaintiff Frank Malley is a former KBR employee who was stationed at Balad Air Base from June 2005 to November 2008. Plaintiff Malley was constantly exposed to the toxic emissions from the burn pits designed and operated by Defendants.

768. As a direct result of his exposure to the burn pits, Plaintiff Malley suffers from pulmonary complications and respiratory problems.

769. Plaintiff Robert E. McCook, whose address is 15112 Mandarin Crossing, Pflugerville, Texas 78660, is a U.S. citizen who is a permanent resident of the State of Texas.

770. Plaintiff Robert McCook was deployed to Balad Air Base from January 2004 to March 2005 with the 51<sup>st</sup> Maintenance Company. Plaintiff McCook was constantly exposed to the hazardous toxins emitted by the burn pits designed and operated by Defendants, as well as the contaminated water provided by Defendants.

771. As a direct result of his exposure to the burn pits and to contaminated water, Plaintiff McCook suffers from chronic obstructive pulmonary disease, asthma, diabetes, high fevers, bleeding gums, lesions, rashes, migraines, gastrointestinal problems, high blood pressure and pulmonary complications.

772. Plaintiff Roger D. Nation, whose address is 5448 Johnston Circle, Ft. Sam Houston, Texas 78234, is a U.S. citizen who is a permanent resident of the State of Texas.

773. Plaintiff Roger Nation was deployed to Tallil in 2004 with the 10<sup>th</sup> Combat Support Hospital. Plaintiff Nation was constantly exposed to the hazardous toxins emitted by the burn pits designed and operated by Defendants.

774. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff Nation suffers from pulmonary problems.

775. Plaintiff Steve Palmer, whose address is 12045 Terra Circle, Forney, Texas 75126, is a U.S. citizen who is a permanent resident of the State of Texas.

776. Plaintiff Steve Palmer has been deployed from 2003 to several bases around Iraq, including Balad Air Base, Camp Liberty, Taji and Fallujah. Plaintiff Palmer is constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

777. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff Palmer suffers from sleeping issues and headaches.

778. Plaintiff Marcus L. Sykes, whose address is 9542 Vallecito Mesa, San Antonio, Texas 78520, is a U.S. citizen who is a permanent resident of the State of Texas.

779. Plaintiff Marcus Sykes was deployed to Balad Air Base with the 465<sup>th</sup> Transportation Unit from January 2005 to January 2006. Plaintiff Sykes was constantly exposed to the hazardous toxins emitted by the burn pits designed and operated by Defendants.

780. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff Sykes suffers from asthma.

781. Plaintiff Joe Sanchez, whose address is 819 E. 14<sup>th</sup> Street, Odessa, Texas 79762, is a U.S citizen who is a permanent resident of the State of Texas.

782. Plaintiff Joe Sanchez was deployed to Tikrit, Iraq with the United States Army.

783. Plaintiff Sanchez was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

784. As a direct result of his exposure to the burn pits, Plaintiff Sanchez suffers from severe joint pain.

785. Plaintiff Thomas Joseph Washington, Jr., whose address is 5021 Teal Drive, Killeen, Texas 76542, is a U.S. citizen who is a permanent resident of the State of Texas.

786. Plaintiff Thomas Joseph Washington, Jr. was deployed to Balad Air Base with the United States Army from 2007 to 2009.

787. Plaintiff Washington was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

788. As a direct result of his exposure to the burn pits, Plaintiff Washington suffers from pulmonary complications.

**UTAH**

789. Plaintiff John A. Wester Jr., whose address is 5995 South 450 East, Murray, Utah 84107, is a U.S. citizen who is a permanent resident of the State of Utah.

790. Plaintiff John A. Wester was deployed to Afghanistan with the United States Army as part of the 1<sup>st</sup> Battallion, 19<sup>th</sup> Special Forces Group of the Utah National Guard and was stationed at Bagram Air Base from January 2004 through June 2004. He was re-deployed in 2006. Plaintiff Wester was constantly exposed to the toxic emissions from burn pits designed and operated by Defendants during his deployment in Afghanistan.

791. As a direct result the toxic emissions from the burn pits designed and operated by Defendants, Plaintiff Webster suffers from severe sleep apnea and Hodgkin's lymphoma. As a result of Defendants' misconduct, Plaintiff Webster has been forced to undergo radiation and chemotherapy, and remain under a doctor's surveillance for resurgence of cancerous growths and other forms of cancer.

792. Plaintiff Michael Benjamin Clair, whose address is 2002 View Drive South, Weber, Utah 84405, is a U.S. citizen who is a permanent resident of the State of Utah.

793. Plaintiff Michael Benjamin Clair was deployed to Iraq three times, with the most recent deployment in 2006 to Balad Air Base. Plaintiff Clair was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants, as well as the contaminated water provided by Defendants.

794. As a direct result of the toxins emitted by the burn pits, Plaintiff Clair suffers from chronic coughing and respiratory problems.

795. Plaintiff Martin Dulfon, whose address is 9006 West 2200 South, Cedar City, Utah 84720, is a U.S. citizen who is a permanent resident of the State of Utah.

796. Plaintiff Martin Dulfon was deployed to FOB Hammer in Iraq in March 2007 as a combat engineer. Plaintiff Dulfon was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants.

797. As a direct result of the toxic emissions from the burn pits, Plaintiff Dulfon suffers from pulmonary complications.

## **VIRGINIA**

798. Plaintiff Joshua David Beavers, whose address is 15 Quillen Terrace, Newport News, Virginia 23606, is a U.S. citizen who is a permanent resident of the Commonwealth of Virginia.

799. Plaintiff Joshua David Beavers was deployed to Iraq and Kuwait two times. First, he was deployed to Kuwait and Baghdad from January 2003 to August 2003. During his second deployment, Plaintiff Beavers was deployed to Al Asad from February 2006 to March 2006 and then to Balad Air Base from March 2006 to October 2006. Currently, Plaintiff Beavers is serving at Forward Operating Base Sharana in Afghanistan. Plaintiff Beavers was constantly exposed to harmful toxins emitted from burn pits designed and operated by Defendants.

800. As a direct result of his exposure to the burn pits designed and operated by Defendants, Plaintiff Beavers suffers from several tumors in his hand, known as epitheloid hemangioendothelioma. As a direct result of Defendants' misconduct, Plaintiff Beavers was forced to undergo surgery to remove his whole middle finger and half of the index finger from his left hand.

801. Plaintiff Matthew Joel Fields, whose address is 3940 Quailshire Lane, Chesapeake, Virginia 23321, is a U.S. citizen who is a permanent resident of the Commonwealth of Virginia.

802. Plaintiff Matthew Joel Fields is currently working for Computer Science Corporation in Jalalabad, Afghanistan. He was deployed on January 2009. He is a Senior Field Service Representative who replaces and repairs camera systems. Plaintiff Fields is constantly exposed to the harmful toxins emitted from burn pits designed and operated by Defendants.

803. As a direct result of his exposure to the burn pits, Plaintiff Fields suffers from dry, burning eyes.

804. Plaintiff Steven E. Gardner, whose address is 130 Cranes Corner, Fredericksburg, Virginia 23606, is a U.S. citizen who is a permanent resident of the Commonwealth of Virginia.

805. Plaintiff Steven Gardner was deployed from April 2003 to April 2008. He spent the majority of his deployment at Camp Liberty in Baghdad. He began his deployment as a truck driver and then became a Transportation Distribution Sergeant. Plaintiff Gardner was constantly exposed to the harmful toxins emitted from the burn pits designed and operated by Defendants.

806. As a result of his exposure to the burn pits, Plaintiff Gardner suffers from constant headaches and vision problems.

807. Plaintiff Steven R. Jones, whose address is 2709 Deerfield Crescent, Newport News, Virginia 23606, is a U.S. citizen who is a permanent resident of the Commonwealth of Virginia.

808. Plaintiff Stephen Jones has worked for Computer Science Corporation since January 2009. He works at Forward Operating Base Fenty in Jalalabad, Afghanistan. He works on high security camera and radar systems.

809. Plaintiff Jones is constantly exposed to the harmful toxins emitted from burn pits designed and operated by Defendants, as well as the contaminated water provided by Defendants.

810. As a direct result of exposure to the burn pits and as a direct result of his exposure to contaminated water, Plaintiff Jones suffers from headaches, nausea, pulmonary problems, gastrointestinal issues and dizziness.

811. Plaintiff Kevin Scott Tewes, whose address is 1200 First Street, Apartment 1635, Alexandria, Virginia 22314, is a U.S. citizen who is a permanent resident of the Commonwealth of Virginia.

812. Plaintiff Kevin Scott Tewes served in Iraq from October 2006 to December 2007. He began his tour at Forward Operating Base Loyalty in eastern Baghdad, where he served as a brigade staff officer for approximately four months. He spent the remainder of his tour at Camp Liberty in western Baghdad and at the International Zone in central Baghdad. Plaintiff Tewes was constantly exposed to the harmful toxins emitted from burn pits designed and operated by Defendants.

813. As a direct result of his exposure to the burn pits, Plaintiff Tewes suffers from sores in his mouth and throat, pulmonary problems, including coughing up blood, bronchial asthma, chronic wheezing, multiple allergies, a chronically inflamed throat, and polyps in his airways. As a direct result of Defendants' misconduct, Plaintiff Tewes is forced to take daily inhalational steroid therapy as well as daily bronchodilators. During

and since his deployment, Plaintiff Tewes has also been required to take intermittent courses of systemic oral corticosteroids to control inflammation in his airway and lungs.

814. Plaintiff Hans Nicolas Yu, whose address is 8515 Towne Manor Court, Alexandria, Virginia 23606, is a U.S. citizen who is a permanent resident of the Commonwealth of Virginia.

815. Plaintiff Hans Nicolas Yu was stationed at Camp Bucca from December 2007 to September 2009 with the Navy.

816. As a result of his exposure to the toxic emissions from the burn pits, Plaintiff Yu suffers from pulmonary and dermatological problems.

817. Plaintiff Michael Gibson, whose address is 9988 Shortbread Way, Bristow, Virginia 20136, is a U.S. citizen who is a permanent resident of the Commonwealth of Virginia.

818. Plaintiff Michael Gibson was deployed to the Green Zone in Baghdad from February 2008 to July 2008, working for Raytheon. Plaintiff Gibson was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

819. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff Gibson suffers from neurological problems, rashes, sleep disturbances, pulmonary complications, muscle and soft tissue damage and painful lymph nodes.

820. Plaintiff Michele Pearce, whose address is 1835 Kirby Road, McLean, Virginia 22101, is a U.S. citizen who is a permanent resident of the Commonwealth of Virginia.

821. Plaintiff Michele Pearce was deployed to Iraq in 2006 with the United States Air Force. Her tour included Camp Victory and Abu Ghraib. Plaintiff Pearce was constantly exposed to the hazardous toxins emitted by burn pits designed and operated by Defendants.

822. As a direct result of her exposure to the toxic emissions from the burn pits, Plaintiff Pearce suffers from two forms of rare cancer. She has been forced to undergo numerous surgeries and chemotherapy.

### **WASHINGTON**

823. Plaintiff Thomas Olson is a U.S. citizen who is a permanent resident of the State of Washington, residing at 30 NE Daybreak Dr., Belfair, Washington 98528.

824. Plaintiff Thomas Olson was deployed to Camp Anderson, Camp Chesty and Camp Geiger in Iraq in 2003. Plaintiff Olson worked as a physician's assistant in a mobile surgical unit. Plaintiff Olson was constantly exposed to the harmful toxins emitted from the burn pits designed and operated by Defendants.

825. As a direct result of his exposure to the burn pits designed and operated by Defendants, Plaintiff Olson suffers from chronic cough, post-nasal drip, allergies, and bronchitis.

826. Plaintiff Brian Paulson is a U.S. citizen who is a permanent resident of the State of Washington, residing at 4312 240th Street, Bothell, Washington 98021.

827. Plaintiff Brian Paulus has been deployed with General Dynamics to Balad Air Base since 2005. He also spent six months with the Navy in Fallujah. Plaintiff Paulus was constantly exposed to the harmful toxins emitted from the burn pits designed and operated by Defendants, as well as the contaminated water provided by Defendants.

828. As a direct result of his exposure to the burn pits designed and operated by Defendants and as a direct result to his exposure to contaminated water, Plaintiff Paulus suffers from cramps, vomiting, diarrhea, skin rashes, and pulmonary complications.

829. Plaintiff Paul Michael Wiatr is a U.S. citizen who is a permanent resident of the State of Washington, residing at 403 AFSB, Unit 15016, Box 583, APO, AP 96218 South Korea.

830. Plaintiff Paul Wiatr was stationed at FOB Marez in Mosul from October 2004 to October 2005. He served as a logistician. Plaintiff Wiatr was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

831. As a direct result of his exposure to the burn pits designed and operated by Defendants, Plaintiff Wiatr suffers from seizures and brain tumors. As a result of Defendants' misconduct, Plaintiff Wiatr has been forced to undergo chemotherapy.

832. Plaintiff Ray L. Johnson is a U.S. citizen who is a permanent resident of the State of Washington, residing at 27588 SR 20, Oak Harbor, Washington 98277-8310.

833. Plaintiff Ray L. Johnson was a heavy truck driver for KBR from December 2003 to March 2004. Plaintiff Johnson was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

834. As a direct result of his exposure to the burn pits designed and operated by Defendants, Plaintiff Johnson suffers from neurological problems, pulmonary, and cardiovascular issues.

835. Plaintiff Travis Bassett is a U.S. citizen who is a permanent resident of the State of Washington, residing at 5012 Carole Drive NE, Olympia Washington 98516.

836. Plaintiff Travis Bassett was deployed to Balad Air Base with the Washington Army National Guard twice, first in 2005 and again in 2008.

837. Plaintiff Bassett was constantly exposed to the hazardous toxins emitted from burn pits designed and operated by Defendants and the contaminated water provided by Defendants.

838. As a direct result of his exposure to the burn pits and contaminated water, Plaintiff Bassett suffers from persistent skin rashes.

### **WISCONSIN**

839. Plaintiff Michael Foth is a U.S. citizen who is a permanent resident of the State of Wisconsin, residing at W13020 County Road J, Lodi, Wisconsin, 53555.

840. Plaintiff Michael Foth was deployed from May 2004 to March 2005 to Balad Air Base, Talil, Camp Speicher and FOB Ridgeway. Plaintiff Foth was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

841. As a direct result of his exposure to the burn pits designed and operated by Defendants, Plaintiff Foth suffers from sleep apnea.

842. Plaintiff Adam David Lemons is a U.S. citizen who is a permanent resident of the State of Wisconsin, residing at 189 Everett Street, Fond du Lac, Wisconsin 54935.

843. Plaintiff Adam David Lemons was deployed to Bagram Air Force Base from 2004-2007. Plaintiff Lemons was constantly exposed to hazardous toxins emitted from the burn pits designed and operated by Defendants.

844. As a direct result of his exposure to the toxic emissions from the burn pits, Plaintiff Lemons suffers from sleep apnea, sinusitis and allergies.

845. Plaintiff Brett Anthony Mazzara is a U.S. citizen who is a permanent resident of the State of Wisconsin, residing at 7709 Greenwood Road, Verona, Wisconsin 53593.

846. Plaintiff Brett Anthony Mazzara was deployed three times to Iraq with the Air Force. In 2005, he was sent to Bagram. In 2006, he was sent to Balad and Bagram. In 2007, he returned to Bagram. Plaintiff Mazzara served as an aircraft mechanic during all three deployments. Plaintiff Mazzara was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

847. Plaintiff Mazzara stated that while at Bagram, when the wind blew towards the north end of the runway, the smoke would be thick and last for days. With ash mixed in, "it almost looked like snow in the fog", he described. Ed Treleven, *Two local veterans file lawsuit against civilian defense contractors*, Wisconsin State Journal, at [http://host.madison.com/wsj/news/local/crime\\_and\\_courts/article\\_26c8314e-cfe1-11de-b746-001cc4c03286.html](http://host.madison.com/wsj/news/local/crime_and_courts/article_26c8314e-cfe1-11de-b746-001cc4c03286.html) (last visited March 4, 2010).

848. As a direct result of his exposure to the burn pits designed and operated by Defendants, Plaintiff Mazzara suffers from sleep apnea, a chronic cough and pulmonary problems. He also gets winded climbing stairs.

849. Plaintiff Michael Smith is a U.S. citizen who is a permanent resident of the State of Wisconsin, residing at 654 W. Prairie Street, Columbus, Wisconsin 53925.

850. Plaintiff Michael Smith was deployed from October 2004 to March 2006. He was involved with convoy security. Plaintiff Smith was constantly exposed to the hazardous toxins emitted from the burn pits designed and operated by Defendants.

851. As a direct result of his exposure to the burn pits designed and operated by Defendants, Plaintiff Smith suffers from fatigue and pulmonary complications.

## **WYOMING**

852. Plaintiff Glen S. Massman is a U.S. citizen who is a permanent resident of the State of Wyoming, residing at 1810 Gettysburg Drive, Cheyenne, WY 82007.

853. Plaintiff Glen Massman was stationed at Camp Bucca, Iraq in 2006 and 2007. He was exposed to toxic emissions from the bum pits designed and operated by Defendants.

854. As a direct result of his exposure to the toxic emissions from the bum pits, Plaintiff Massman suffers from chronic cough, respiratory problems, headaches and flu-like symptoms, sleep apnea, tightness in his chest, constant dry cough, increased allergic sensitivities, frequent headaches, and hypertension. As a result of Defendants' misconduct Plaintiff Massman is forced to rely on inhalers, and a machine to sleep at night.

855. Plaintiff Wendy McBreairty is a U.S. citizen who is a permanent resident of the State of Wyoming, residing at 74 Julianna Road, Cheyenne, WY 82007.

856. Plaintiff Wendy McBreairty was stationed at Balad Air Base in Iraq. She was constantly exposed to toxic emissions from the burn pits designed and operated by Defendants.

857. As a direct result of her exposure to toxic emissions from the burn pits, Plaintiff McBreairty suffers from chronic cough, respiratory symptoms, sore joints, rheumatoid arthritis, muscle spasms, chronic pain syndrome, and multiple sclerosis.

858. Plaintiff Steven Craig Brasfield is a U.S. citizen who is a permanent resident of the State of Wyoming. His address is P.O. Box 1310, Wright, Wyoming 82732.

859. Plaintiff Steven Craig Brasfield was deployed to Iraq from August 2007 to April 2008. He was at Baghdad and Balad Air Base Plaintiff Brasfield was constantly exposed to the harmful toxins emitted from burn pits designed and operated by Defendants.

860. As a direct result of his exposure to the burn pits, Plaintiff Brasfield suffers from chronic obstructive pulmonary disease, chronic restrictive pulmonary disease, swollen lymph nodes, decreased lung capacity, chest pains and chronic cough. As a result of Defendants' misconduct, he is forced to live on outpatient oxygen.