

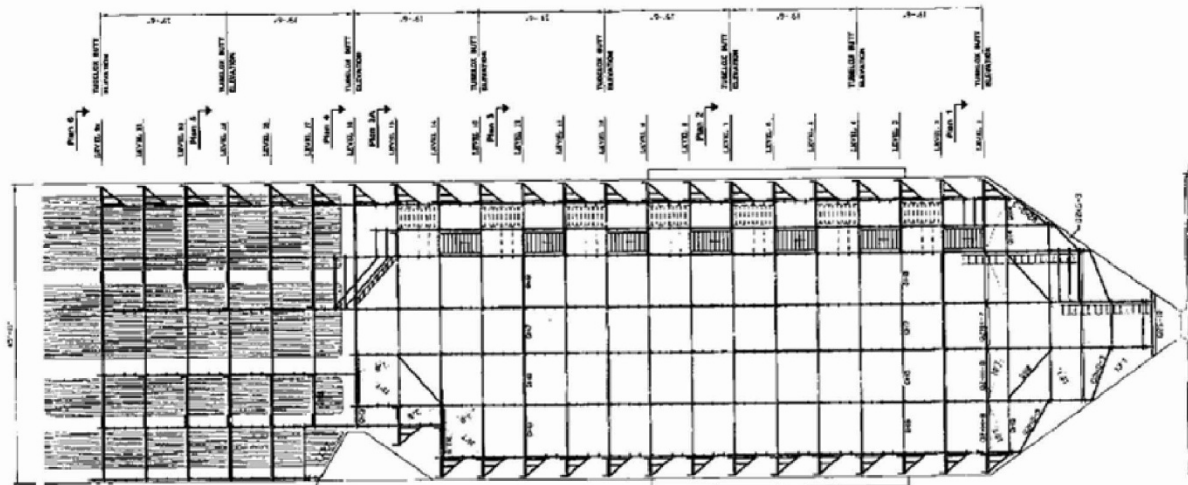
# eDiscovery Case Study

Victor Daniel Power Plant  
Boiler #2  
Escatawpa, MS  
November 4, 2011



PIC-PH-016301





Section A - A  
Scale: 1/8" = 1'-0"

**PRELIMINARY**  
**NOT FOR CONSTRUCTION**

**PRELIMINARY**  
NOT FOR CONSTRUCTION

**LEGEND INDEX**

- SP = STEEL PLANKS
- CH = GRS HORIZONTAL
- GD = GRS DIAGONAL BRACE
- T = TUBESLOW
- GP = GRS POST
- TR = GRS TRUSS
- PL = PLAN BRACE
- GB = GRS BRACKET
- P = STEEL PLANKS

**GENERAL NOTES:**

1. CONTRACTOR TO CHECK AND VERIFY ALL DIMENSIONS AT JOINTS BEFORE PROCEEDING WITH WORK.
2. TOTAL ALLOWABLE LIVE LOAD IN USE PER SQUARE FOOT OF WORKING AREA. SCAFFOLDING HAS BEEN DESIGNED TO SUPPORT ALLOWABLE IN TENDING LOADS OF 1000 LBS. AND EQUIPMENT. SCAFFOLDING SHALL NOT BE LOADED BY EXCESS OF THIS WORKING LOAD FOR WHICH IT IS DESIGNED.

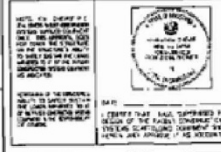
**NOTE:**

1. GRS DIAGONAL BRACE AS GUARDRAIL AND WORKING AT STAIR WELLS.
2. TRUSS IN WORKERS MUST BE UTILIZED KNOWN PLANK BEAR ON SPANS LARGER THAN 4'-0".

FOR SAFETY RULES, RECOMMENDATIONS, AND INSTRUCTIONS FOR THE USE AND INSTALLATION: SEE VOL. 9 - 900000 - GRS S. SAFETY RULES AND COMPONENT IDENTIFICATION HANDBOOK.

FOR IMPORTANT GENERAL NOTES AND ACCESS RECOMMENDATIONS APPLYING TO THIS PROJECT BE CERTAIN TO REFER TO SHEET NO. 6 AND NOT PROCEED WITH THE CREATION OR USE OF THIS EQUIPMENT UNLESS YOU HAVE READ AND UNDERSTOOD THE SAFETY INFORMATION CONTAINED IN REFERENCE TO 900000 ATTACHED TO THESE DRAWINGS IF YOU DO NOT HAVE THIS BOOKLET CALL 1-800-868-7642 EXT. 100000.

This drawing is based on the information supplied and the design and construction details contained on the property of Patent Construction Systems, Inc. and is not to be used for any other purpose without the written consent of Patent Construction Systems, Inc. The user of this drawing assumes all liability for the safety of the structure and the safety of the workers.



SCALE NTD	UNIT IN	DATE CK	DATE 05.08.2008	DATE 05.18.2008
MATERIALS - Landmark PROJECT - Unit 1 (Boiler - Mississippi Power Co. LOCATION - Mississippi TITLE - GRS Scaffold Layout				
			DRAWING NUMBER <b>6508Q073</b>	

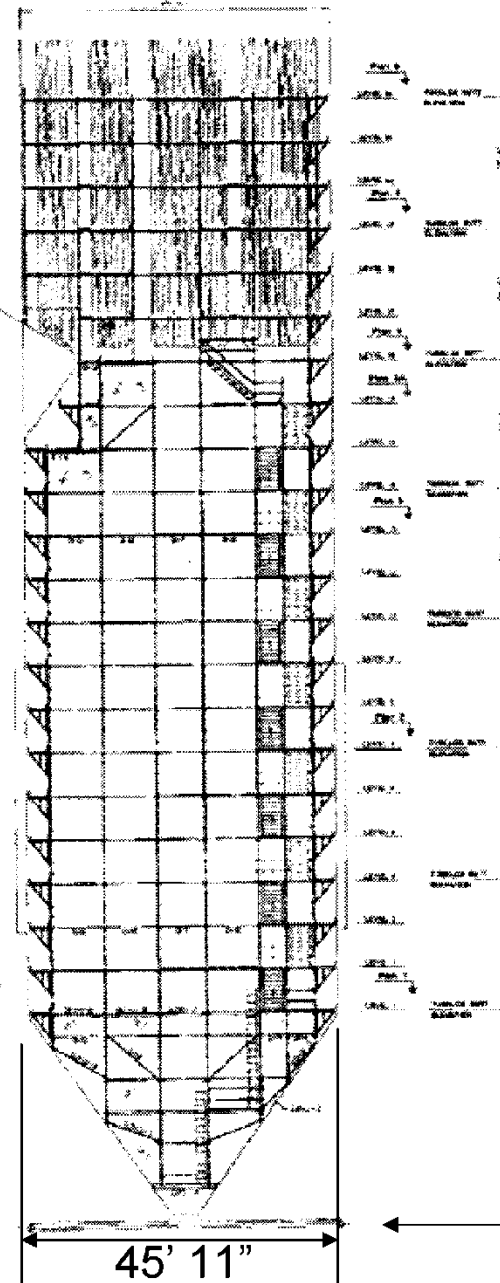


219' →  
Dance Floor

177' →  
Dance Floor

150' →  
Dance Floor

87' →  
Dance Floor



Section A - A

226'

(146')

80'

(31' 8")

48' 4"

45' 11"

PRELIMINARY  
NOT FOR CONSTRUCTION

DATE	REV	BY	CHKD	DATE	BY
10/10/06	1	JA	JA	10/10/06	JA
Project: Level 10 - Westridge Power Co.					
Location: Westridge					
Client: Westridge Power Co.					
Contract: 65080073					
Patent Construction Systems					
Patent Construction Systems					

EST0000196



PIC-PH-001068





PIC-PH-001042





PIC-PH-001040





PIC-PH-001022





November 11, 2008

Arrival at  
Victor Daniel Power Plant  
Escatawpa, MS





## Video Monitoring of Scaffold Component Removal





**BALCH & BINGHAM LLP**

Alabama • Georgia • Mississippi • Washington, DC

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(228) 314-0409

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1310 Twenty Fifth Avenue  
P.O. Box 130 (36522)  
Gulfport, Mississippi 39501  
(228) 864-9900  
(228) 864-8211 Fax  
www.balch.com

(888) 506-8672 (direct fax)  
pdelcambre@balch.com

November 17, 2008

Re: **LETTER AGREEMENT: RESTRICTIONS ON THE USE OF PHOTOGRAPHY,  
CONFIDENTIALITY AGREEMENT AND PROTOCOL**

To All:

My firm represents Mississippi Power Company and its affiliated owners of Plant Victor Daniel Generating Facility in the accident investigation regarding scaffold collapse at Unit # 2 boiler at Plant Daniel, located at 13201 Highway 63 Escatawpa, MS, on November 4, 2008 (the "Investigation").

This agreement is intended to govern the confidentiality, use and protocol of still photography, digital photographs, digital video and/or any other images (the "Photography") concerning the Investigation. This agreement governs and is to be executed by Mississippi Power Company, PIC Group, Inc., Land Coast Insulation, Inc. and Patent Construction Systems, their agents, experts, assigns, company representatives, attorneys, insurers, adjusters, contractors and/or vendors.

Regarding any Photography copyright owned by you, or which may later be owned by you by the taking of the Photography at Plant Daniel site at 13201 Highway 63 Escatawpa, MS (the "Site"), you hereby agree that the Photography will be used solely to support your Investigation and any claims, defenses and/or litigation concerning the incident that is the subject of the Investigation. You also agree that no cellular phones will be utilized during the Investigation to take any Photography of the Site. You further agree that such Photography will not be used, displayed, reproduced, posted publicly, including to the Internet or World Wide Web, for any other purpose and further that such Photography will not be transmitted by e-mail attachment to anyone or posted to any Internet site.

The Photography may contain certain proprietary and confidential information of the Site. The Photography is to be kept confidential and is to be governed by the following protocol: You agree to present yourself each morning (or otherwise upon arrival to the Site) to the designated PIC Safety Coordinator at the PIC trailer on Site. There, you will sign in and present any Photography equipment to be utilized during the Inspection. At the conclusion of each work day, you agree to return to the PIC Safety Coordinator to copy/transfer/download all Photography to a master hard drive to be backed-up daily and maintained by PIC. Once copied/transferred/downloaded, your digital storage device/Photography device will be returned to your custody with the original Photography intact and in your possession, remaining on your device. You also agree to copy/transfer/download your camera and/or digital storage device of all Photography previously taken from the Site relating to the Investigation to the PIC Safety Coordinator's master hard drive. You understand that this agreement applies to your agents,

**Joint Protocol and Schedule for Selected Evidence Transportation, Storage,  
Non-Destructive Examination, and Selection of Specific Specimens for  
Further Analysis/Testing Under Separate Protocols**

**Regarding:  
November 4, 2008  
Scaffolding Collapse Unit No. 2 Boiler**

**Location:  
Mississippi Power Plant Daniel  
13201 Highway 63  
Escatawpa, Mississippi**

---

It is the recommendation of Engineering Systems, Inc. that all components of the collapsed scaffold be retained and preserved unless written authorization from all known potential parties of interest is submitted regarding the disposition of the non-selected collapsed scaffold components. Decisions pertaining to the ultimate disposition of potential evidentiary items are the responsibility of the parties of interest.

The following outlines the scope of the Selected Evidence Transportation, Storage, Non-Destructive Examination and Specific Specimen Selection Phase of the analysis. Further analysis should be conducted jointly with potential parties of interest, so as to afford them the opportunity to evaluate the evidence in its present state and to participate in further examination efforts that might be destructive in nature.

Further analysis efforts are still subject to the conditions previously outlined in the following:

November 14, 2008	<b>"Letter Agreement: Restrictions on the Use of Photography, Confidentiality Agreement and Protocol"</b>
November 17, 2008	<b>"Consensus Protocol for Evidence Selection"</b>
November 21, 2008	<b>"Consensus Protocol for Selected Evidence Retention"</b>
December 1, 2008	<b>"Consensus Protocol for Non-Selected Evidence Retention"</b>

---

**Joint Protocol for Examination of Selected Evidence**

Victor Daniel Power Plant  
DATE: December 30, 2008

1 of 13







PIC-PH-003381

Collected  
11/08/2008

Contained 36  
Personal  
Effects

Including 3 Cell  
Phones



PIC-PH-003387



## Evidence Chain of Custody

ESI File Number: 27986T

Description of Items: 52A  
Cell Phone - AT&T LG w/ Battery  
52B  
Cell Phone - AT&T Samsung w/ Battery  
52C  
Cell Phone - Sprint Samsung w/ Battery  
Collected From Baller #2  
Mississippi Power Plant Victor Barker

Relinquished by: Michael Craddock  
(Print Name)

Representing: Engineering Systems Inc. / PIC  
(Company)

Michael Craddock  
(Signature)

Date: 11/24/08

To: Matthew Berry  
(Print Name)

Representing: Lateral Consulting Group  
(Company)

[Signature]  
(Signature)

Date: 11/24/08







November 14, 2008

Evidence found in garbage bags  
at Victor Daniel Power Plant  
Escatawpa, MS





PIC-PH-003532



PIC-PH-003548



Copyright Agents

Employee Name	Rate	Per diem	Total	Mon		Tues		Wed		Thurs		Fri		Sat		Sun		Totals	
				ST	OT	ST	OT	ST	OT	ST	OT	ST	OT	ST	OT	ST	OT	ST	OT
Donald Sullivan	7	500	150	12.00	X	11.00	X	10.00	X	7.00	3.00	X	10.00	X	11.00	X	8.50	40.00	32.50
Carlos Galian	1	25.00	480	17.50	x	10.50	x	11.50	x	0.50	4.50	x	5.00	x	12.00	x	12.00	40.00	21.50
Dolores Solis	5	14.00	150	11.50	x	2.00	x	x	x	2.00	x	x	x	x	x	x	x	15.50	x
Pedro Galvan	5	14.00	150	11.50	x	2.00	x	x	x	2.00	x	x	x	x	x	x	x	15.50	x
Roberto Angel	5	18.00	150	15.50	x	2.00	x	x	x	2.00	x	x	x	x	x	x	x	19.50	x
Gary Eagan	5	18.00	150	11.50	x	2.00	x	x	x	2.00	x	x	x	x	x	x	x	16.50	x
Juan Cantu	5	14.00	150	15.50	x	2.00	x	x	x	2.00	x	x	x	x	x	x	x	16.50	x
Victor Ariza	5	16.00	150	11.50	x	2.00	x	x	x	2.00	x	x	x	x	x	x	x	15.50	x
Ismarel Zavala	5	18.00	150	11.50	x	2.00	x	x	x	2.00	x	x	x	x	x	x	x	15.50	x
Robert Rusconi	5	18.00	100	15.50	x	2.00	x	x	x	2.00	x	x	x	x	x	x	x	15.50	x
June Lopez	5	16.00	150	11.50	x	2.00	x	x	x	2.00	x	x	x	x	x	x	x	17.50	x
Silverio Jimenez	5	16.00	150	11.50	x	2.00	x	x	x	2.00	x	x	x	x	x	x	x	15.50	x
Eric Galvan	5	18.00	150	11.50	x	2.00	x	x	x	2.00	x	x	x	x	x	x	x	15.50	x
Felipe Medina	5	18.00	150	15.50	x	2.00	x	x	x	2.00	x	x	x	x	x	x	x	19.50	x
Moses Ramos	5	16.00	n/a	11.50	x	2.00	x	x	x	2.00	x	x	x	x	x	x	x	15.50	x
Gerardo Pacheco	5	14.00	n/a	15.50	x	2.00	x	x	x	2.00	x	x	x	x	x	x	x	19.50	x
William J. Almadorar	5	18.00	n/a	11.50	x	2.00	x	x	x	2.00	x	x	x	x	x	x	x	15.50	x
Nathaniel Delgado	5	16.00	n/a	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Daniel A. Rivera	5	14.00	n/a	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Jesue Victor Hadd	5	16.00	150	15.50	x	2.00	x	x	x	2.00	x	x	x	x	x	x	x	19.50	x
Anastades A. Capó	5	18.00	150	11.50	x	2.00	x	x	x	2.00	x	x	x	x	x	x	x	15.50	x
Byron Thomas	5	14.00	n/a	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Timothy Caffey	5	12.00	n/a	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Amarantez Carlson	5	10.00	n/a	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Cesar A. Cruz	5	18.00	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Francisco Posada	5	14.00	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Manuel Salgado	5	14.00	100	11.50	x	2.00	x	x	x	x	x	x	x	x	x	x	x	13.50	x
Tracy James	5	19.50	350	13.00	x	13.00	x	13.00	x	1.00	12.00	x	12.00	x	x	x	x	40.00	24.00







Daily Sign in & out  
completed.

Ulyssa J. Rodriguez

Ulyssa J. Rodriguez


Phil Gilmer 251-639-1272

**Illinois**  
Jesse White - Secretary of State

**ID CARD**

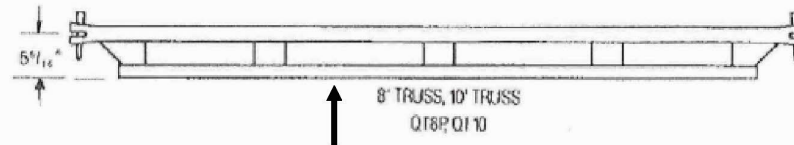
BRUNDA 02721037 SOF BORN Eyes  
WAVE 507 176 lbs 1000 Class  
08/25

Henry White

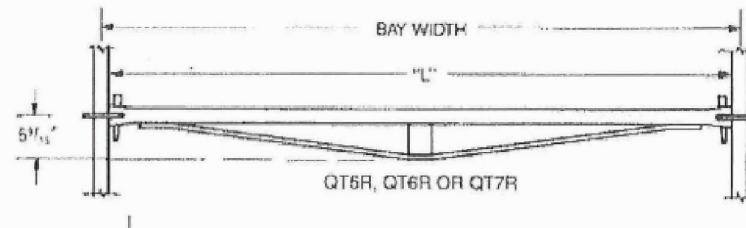


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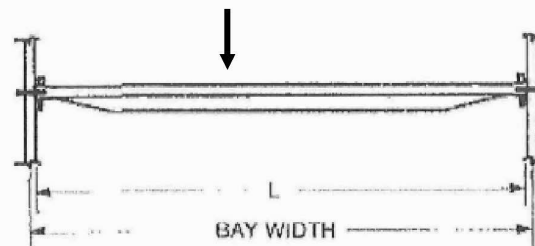
# SCAFFOLD COMPONENTS



## PLATE TRUSS

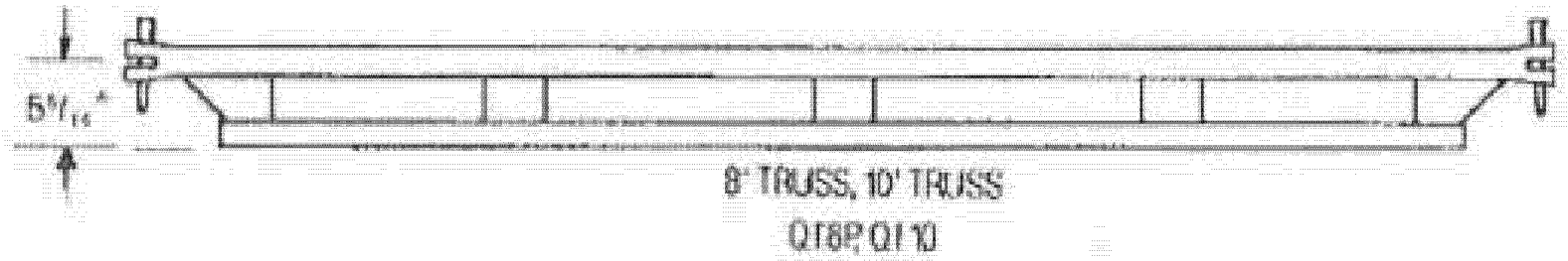


## HEAVY HORIZONTAL



"L"	PART NO.	BAY WIDTH	WEIGHT
4'-10 <sup>7</sup> / <sub>32</sub> " (1.48M)	Q2HH-5	5'-0" (1.52M)	24 LBS. (10.89KG)
5'-10 <sup>7</sup> / <sub>32</sub> " (1.78M)	Q2HH-6	6'-0" (1.83M)	29 LBS. (13.15KG)
6'-10 <sup>7</sup> / <sub>32</sub> " (2.09M)	Q2HH-7	7'-0" (2.13M)	35 LBS. (15.88KG)
7'-10 <sup>7</sup> / <sub>32</sub> " (2.39M)	Q2HH-8	8'-0" (2.44M)	40 LBS. (18.14KG)

## PLATE TRUSS







PIC-PH-003360





PIC-PH-007027







SAFETY RULES 910R3  
**SAFE ALLOWABLE LOADS FOR  
 BEARERS AND TRUSSES**

QES PART NUMBER	DESCRIPTION	MAXIMUM UNIFORM LOAD (LBS./FT.)	ALLOWABLE CONCENTRATED LOAD AT CENTER (LBS.)	ALLOWABLE BEARER DESIGN LOAD IN #/SQ. FT.			
				6' RUNNER	7' RUNNER	8' RUNNER	10' RUNNER
QH3	3' BEARER	533	800	88	76	67	53
QH4	4' BEARER	380	600	50	43	38	30
QH5	5' BEARER	182	480	32	27	24	19
QT5R	5' ROD TRUSS	450	1125	75	64	56	45
QT6R	6' ROD TRUSS	312	940	52	45	39	31
QT7R	7' ROD TRUSS	243	850	41	35	30	24
QT8P	8' PL. TRUSS	384	1500	64	55	48	38
QT10	10' PL. TRUSS	195	980	33	28	25	19
QT16	16' TRUSS	177	1980	30	25	22	18
QT20	20' TRUSS	130	1834	22	18	16	13



3', 4', 5' BEARER



5', 6', 7' ROD TRUSS



8', 10' PLATE TRUSS

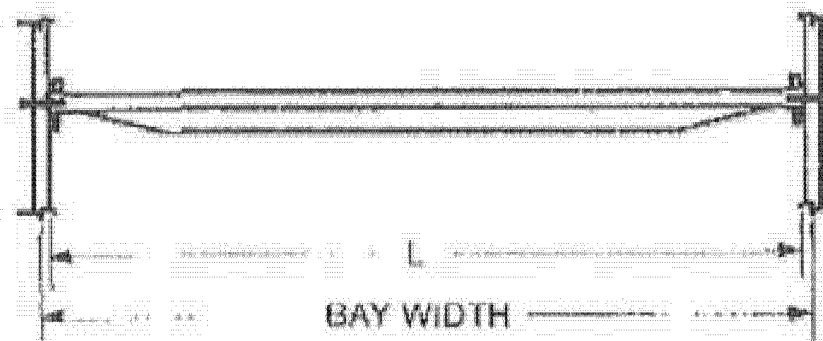


16', 20' TRUSS

DO NOT EXCEED THE ALLOWABLE LOADINGS SHOWN IN THE ABOVE TABLES

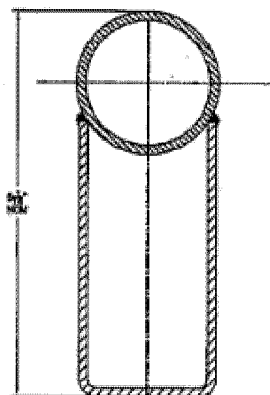
006

# HEAVY HORIZONTAL



"H"	PART NO.	BAY WIDTH	WEIGHT
4'-10 <sup>7</sup> / <sub>32</sub> " (1.48M)	Q2HH-5	5'-0" (1.52M)	24 LBS. (10.89KG)
5'-10 <sup>7</sup> / <sub>32</sub> " (1.78M)	Q2HH-6	6'-0" (1.83M)	29 LBS. (13.15KG)
6'-10 <sup>7</sup> / <sub>32</sub> " (2.09M)	Q2HH-7	7'-0" (2.13M)	35 LBS. (15.88KG)
7'-10 <sup>7</sup> / <sub>32</sub> " (2.39M)	Q2HH-8	8'-0" (2.44M)	40 LBS. (18.14KG)


PART NUMBER	PROF. C/Y	SIZE	L. LENGTH	ASSEMBLY WEIGHT	COLOR CODE
	FEET-INCHES (m)	WEIGHT	FEET-INCHES (m)	LB. (KG)	
Q20444	4'-0" (1.22)	Q2044-1	3'-10" 7/32" (1.17)	14 (6.42)	GREEN
Q20445	6'-0" (1.83)	Q2045-1	6'-10" 7/32" (1.62)	34 (15.09)	BLUE
Q20446	8'-0" (2.44)	Q2046-1	9'-10" 7/32" (1.74)	39 (17.55)	ALUMINUM
Q20447	7'-0" (2.13)	Q2047-1	8'-10" 7/32" (2.04)	36 (16.50)	DM
Q20448	8'-0" (2.43)	Q2048-1	7'-10" 7/32" (2.39)	40 (18.14)	YELLOW
Q20449	6'-0" (1.87)	Q2049-1	8'-10" 7/32" (2.70)	48 (20.41)	WHITE
Q204512	10'-0" (2.65)	Q204512-1	9'-10" 7/32" (3.00)	60 (22.68)	ORANGE



010

5. AFTER PLACEMENT OF WEDGE, ITEM #3, INTO 1" X 13/32" SLOT AND DOWN THRU THE HOLE BOTTOM SLOT OF THE HORIZONTAL TUBE, ITEM #1, INSTANT THE POWER, ITEM #2, AND REED THE BRIST CHAIR.

2. AFTER POOLING, BRISTLES SHALL PREVENT WEDGE FROM PASSING THRU THE 1" X 13/32" SLOT(S) AT THE TOP OF THE TUBE, BUT STILL ALLOW THE WEDGE/PISTON TO PASS THRU THE BOTTOM SLOT(S).

3	2	INVT. 0/02X2METER X 1/2" LONG ROUND HEAD, STEEL, GALVANIZED			
2	2	LOADING WEDGE			QW
1	1	HORIZONTAL TUBE WELDBOWT			QW
NO.	QTY.	DESCRIPTION			QW. NO.
CONTRACT NO.		 Exclusive rights One Mark Center Street Portsmouth, NH 03801-8955 (603) 861-5500			
		HEAVY HORIZONTAL ASSEMBLY			
		Q.E.S.			
PREPARED	C.A.C.	1-28-88			
CHECKED					
APPROVED					
OTHER APPROVAL:		SIZE	CODE IDENT NO.	DRAWING NO.	REV.
		C	45828	Q2HHX	F
		SCALE	NOTES	UNIT WEIGHT	SEE TABLE





PIC-PH-003365



PIC-PH-003808



PSQ2HH-8  
QES 8' HEAVY HORIZONTAL



7 54824 80610

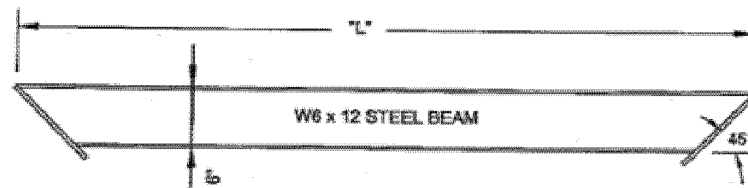
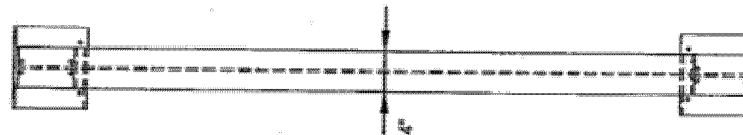
02/22/05 3114

Made in the USA

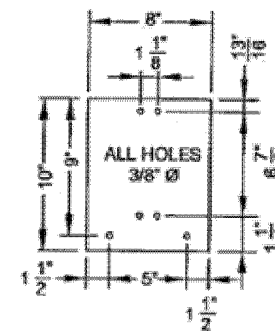




Title: <b>ENGINEERING SCAFFOLDING MANUAL</b>	Issue Date: 06/30/05	By: D. Alderman
Section 3: COMPONENTS	Item: 3.2.3 QES BOILER ACCESS.	Page 6



Q.E.S. PART NO.	LENGTH "L"	WEIGHT
Q2S-6	6' - 0"	84.5 lbs.
Q2S-10	10' - 0"	134.0 lbs.



END PLATE

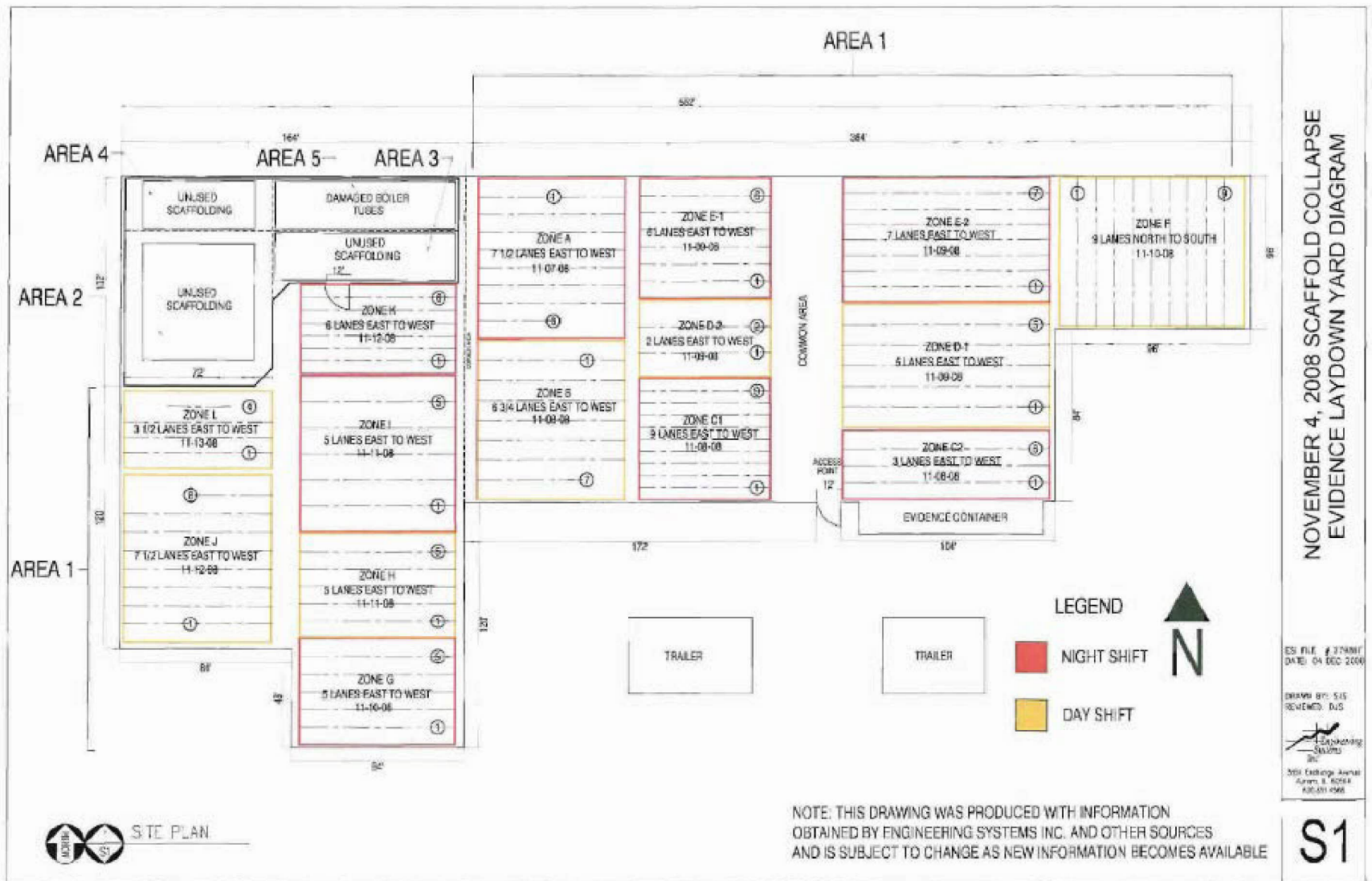
SUPPORT BEAMS



# Lay Down Yard at Victor Daniel Power Plant

Tagging of Evidence





















PIC-PH-009530



AREA 1  
ZONE K  
LANE 5



BLUE

PIC

E.S.I.

P.I.I.

GREEN

PATENT

EXPONENT

RED

LAND COAST

M.E.I.

F.S.C.

YELLOW

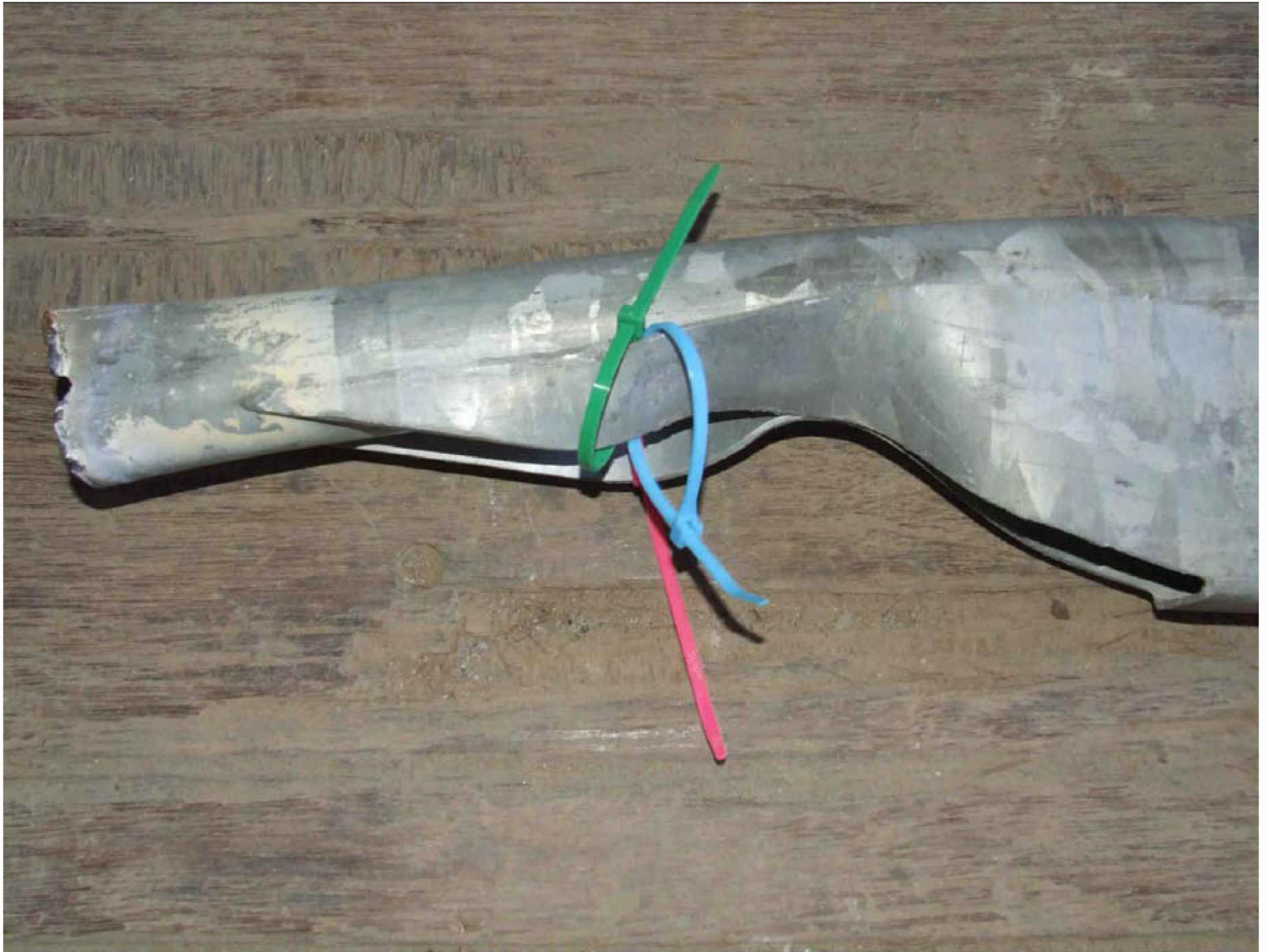
OSHA

ORANGE

MPC







PIC-PH-006053



February 2, 2009

Portable Storage Container  
Departed

Victor Daniel Power Plant  
Escatawpa, MS





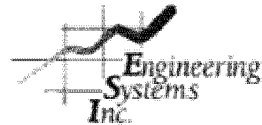








16770 Imperial Valley Dr.  
Suite 150  
Houston, Texas 77060



Phone: (281) 444-0050  
Fax: (281) 444-0002  
esl-web@esl.com

### Evidence Transfer Form

ESI Project Number: 27986 T

Evidence Description: 40 FT CONEX CONTAINER CONTAINING SCAFFOLD COMPONENTS  
AND OTHER ITEMS  
TRUCKED AS #1 THRU 640 RELATED TO SCAFFOLD COLLAPSE

Relinquished by: PTC GROUP GERALD J BERRY

Representing: PTC GROUP

Signature: GERALD J BERRY Gerald J Berry

Date: 02-02-09

Relinquished to: JAMES L. DAUGHENBACH

Representing: ENGINEERING SYSTEMS INC.

Signature: James L. Daughenbach

Date: Feb 2, 2009

Providing Clear Answers  
Through Imaginative and Multidisciplinary Solutions

CONNECTICUT

FLORIDA

ILLINOIS

INDIANA

MICHIGAN

TEXAS





February 3, 2009

Portable Storage Container  
Arrived at ESI's Test and Storage  
Facility  
Kingwood, Texas



PIC NDT000128











February 3-6, 2009

Evidence was removed from  
storage container, sorted and  
placed in secured storage within  
ESI facilities











36 Personal Items  
(3 Cell Phones)

4524 • J. Neurosci., June 23, 2010 • 30(25):4517–4527

1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 26

ES10000128

February 9-13, 2009

Visual, dimensional, and  
photographic documentation of  
evidentiary items was conducted  
at ESI facilities





PIC NDT000876



2009/02/04 08:11:52

PIC NDT000248



# Interim Certification Document

Part Description: Digital Template Certification Date: 04/15/06 Serial#: 012-09-06-00008  
Single Point & Sigma: 0.12 (0.0244mm) (+/- 0.0063) Certificate#: C0320638817  
Linear Displacement & Sigma: 0.12 (0.0244mm) (+/- 0.0130) Ambient Temperature: 22°C +/- 3°C

## Measurement Standards Traceability

Item	Asset Number	Calibration Date	ISI Traceability
Ball Bar 32	636	04/10/06	NPL-LL51010001
10mm Step Gauge, Mitutoyo Code No. 015-744 Measuring range 1.5m	827	08/26/04	NIST-821067216-02

\*The digital gauge has been calibrated with a device traceable to the International System of Units (SI) through a National Metrological Institute (NMI) or through an ISO/IEC 17025 Accredited Laboratory. Expected measurement uncertainty is 1.0 + 1.00 measurement, where 1 measurement refers to 1 standard uncertainty. Uncertainty is expressed at approximately the 95% level of confidence using k=1.96.

## Certification Results

A basic four quadrant certification included with all FARO Arms and comprised of: 2 vertical level single point repeatability test in	PASSED
4 quadrants with 5 repeats from 4 directions	PASSED
Step Gauge Test in 4 quadrants, 3 orientations per quadrant	PASSED
1 Length, 3 position free ball bar test in 4 quadrants	PASSED

Calibration and certification conforms to procedures developed in accordance with ASME B89.4.23-2004.

## Instrument condition as received

Refurbished

## Instrument condition outgoing

Within specifications

Technician: Dan KRAZ

Date: 4/15/06

This certificate shall not be reproduced, copied or falsified.

without permission of FARO Technologies, Inc.

The results of this certificate made only to the items captured or listed.

FARO Technologies, Inc.  
PH1: 1-800-736-2771  
PH2: 407-333-9911  
FAX: 407-333-6056

125 Technology Park  
Lake Mary, FL 32746  
USA

# FARO

Product Manual 3000  
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Page 1 of 16



LABORATORY  
ACCREDITATION  
BUREAU

ISO/IEC 17025 Accredited

2009/02/04 11:55:21

PIC NDT000388

February 13, 2009

Evidence transported to  
Anderson & Associates  
Houston, Texas







## Evidence Chain of Custody

ESI File Number: 2798UT

Description of Items: See spreadsheet attached (2 page)

Relinquished by: Dennis Scardino  
(Print Name)

Representing: Engineering Systems Inc.  
(Company)

[Signature]  
(Signature)

Date: 2/13/09

To: James BaHley  
(Print Name)

Representing: Anderson & Associates  
(Company)

[Signature]  
(Signature)

Date: 2/13/09



February 16-20, 2009

Non-destructive testing was  
performed at Anderson &  
Associates



PIC NDT002417





PIC NDT002425

March 2, 2009

Evidence Transported from  
Anderson to ESI  
Kingwood, Texas











Engineering  
Systems  
Inc.

Phone: (281) 448-6060  
Fax: (281) 448-6062  
esi-website.com

### EVIDENCE CHAIN OF CUSTODY

ESI Project No.:	27986T		Party:	
Date of Incident:	11/04/2008		Location:	Moss Point, MS.
Client	Name:	A. J. Krouse		
	Company:	Frilot L.L.P.		File Name:
	Street:	1100 Poydras Street, Suite 3600		File No.:
	City:	New Orleans	State:	TX
	Telephone:	504-599-8012	Facsimile:	599-8116
			Email:	AKrouse@frilot.com
Date Evidence	<input checked="" type="checkbox"/> Collected	<input type="checkbox"/> Received	03/02/09	
Evidence	<input checked="" type="checkbox"/> Collected by	<input type="checkbox"/> Received by	James Daughenbaugh / Sabrina Lewis of ESI	
Evidence	<input checked="" type="checkbox"/> Transported by	<input type="checkbox"/> Received from	James Daughenbaugh / Sabrina Lewis of ESI	

### List of Specimens

1. H3d various pieces of scaffolding
2. (see full list attached)
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_
7. \_\_\_\_\_
8. \_\_\_\_\_

## Location Collected

Anderson & Associates, Inc.  
919 F.M. Road 1959  
Houston, TX. 77034-5425  
(281) 481-5840

[illegible]

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Through Insights and Multidisciplinary Excellence*

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ESI0000125

## Photography & Videography

PIC

15,845 Photos  
61 Videos

LandCoast

1281 Photos

Patent

884 Photos  
4 Videos

Anderson

1839 Photos  
26 SEM

Mississippi Power

367 Photos  
3 Videos

Plaintiff

9 Photos

Totals

20,225 Photos  
68 Videos  
26 SEM