

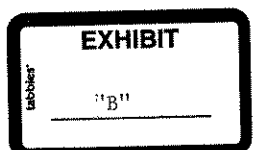
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

NORMAN PAUL TRAHAN	*	CIVIL ACTION
	*	
versus	*	NO. 05-6381
	*	
LABORDE MARINE LIFTS, INC.	*	SECTION "A"
	*	Hon. Jay C. Zainey
*****	*	Mag. Karen Wells Roby

**PLAINTIFF'S ANSWERS TO INTERROGATORIES**

**NOW INTO COURT**, through undersigned counsel, comes plaintiff, Norman Paul Trahan, and for answer to the First Set of Interrogatories propounded by defendant, Laborde Marine Lifts, Inc., respectfully represents:

1. Please state your full name, present home address and telephone number, present business address and telephone number, exact date of birth, place of birth, social security number, driver's license number, any licenses or certificates issued to you by the United States Coast Guard, and any aliases used by you during your lifetime.



**Answer to Interrogatory No. 1:**

Norman Paul Trahan, born November 18, 1977 in Houma, LA, SSN 435-35-7270, Z number 032037, residence: 220 Wilkie Street, Apt. 260, Lafayette, LA 70506, La. Drivers License #6367634, no aliases. Note: Mr. Trahan is in process of vacating this address and his new address will be provided in a supplemental response as soon as he makes other living arrangements. On December 23, 2006, Mr. Trahan temporarily moved in to the home of his mother, Sybil M. Trahan in Houma, LA (her address listed below).

2. Please state a history of your marital relationships, including the date and place of each marriage, the full name of your present spouse and/or former spouse, the date and manner of dissolution of any prior marriage, the age, date, and place of birth of your present spouse, and the occupation and earnings of your present spouse.

**Answer to Interrogatory No. 2:**

Married but once and then to Tanya Curole Trahan (now Quinn), during June 1995 in Terrebonne Parish, Louisiana. He was divorced from her in Terrebonne Parish, Louisiana, during June 2000.

3. State the names and ages of each of your children, their mothers, the date and the place of their birth, whether you provide financial support for those children and the amount of any such support, and any other dependents and their relationship to you and the amount of any financial support you provide to them.

**Answer to Interrogatory No. 3:**

Two children, both born of marriage to Tanya Curole Trahan (now Quinn): Britany Angelle Trahan, born 10/12/95 in Houma, LA., and Norman Paul Trahan, Jr., born 6/29/97 in Houma, LA. There is no court ordered child support. Mr. Trahan paid child support of between \$250 and \$500 per month prior to the incidents sued upon in these proceedings, but has paid nothing since the incidents.

4. State in detail the extent of your formal education, indicating the school, city or town, and grade you last attended, and if you have ever served in the military, please state the branch, the inclusive dates of enlistment, the highest rank achieved, whether you were honorably discharged, and if not honorably discharged, please state the reasons.

**Answer to Interrogatory No. 4:**

- A) St. Francis Catholic School, Houma, La., K-7, graduated about 1991.
  - B) St. Paul's Catholic Boarding School, Covington, La., 8th grade only.
  - C) Obtained GED through Louisiana Academic Studies, Homer, La., in 1999.
  - D) Training ("STCW") and Able Bodied Seaman Course (AB); obtained certificate in 2003. Fletcher - Louisiana Technical College, Houma, Louisiana: Standard Seafarers Watch.
- Copies of certificates attached to responses to requests for production.
- Never served in military.

5. If you have ever been arrested, convicted of or pleaded guilty to a crime, please state the date of such arrest, plea or conviction, the identity of the court involved, the nature of the crime,

the name and address of any penal institution in which you were incarcerated, and the dates of your incarceration.

**Answer to Interrogatory No. 5:**

See attached list styled "Criminal History." Mr. Trahan was incarcerated for the aggravated burglary charge at the David Wade Correctional Center from November 1996 to May 2000. See also, Exhibit 9, Other Litigation.

6. State the names and addresses of each of your employers during the ten years preceding the date of your answers to these interrogatories, and as to each such employer, state the period of employment, the type of work performed, the rate of pay, the total amount of wages you received from said employer, and the reason for termination of said employment. If you were self-employed at any time during the past ten years, please indicate the period of employment, the type of work performed, the rate of pay, the total amount of wages received, and the reason for termination of said self-employment.

**Answer to Interrogatory No. 6:**

Norman Trahan has never been self-employed. See attached list styled "Past Employment."

7. State the amount of gross income received by you from your employment, business, occupation, or profession for each year of the period mentioned in Interrogatory No. 6.

**Answer to Interrogatory No. 7:**

See income tax returns for the years 2000, 2001, 2002, 2003 and 2004 attached to responses to requests for production of documents. Earned about \$500.00 or \$600.00 in 2005; no tax return

required or filed for that year. Mr. Trahan was not employed before 2000. He has no other records of his earnings. Note that he received "share of the catch" from The Big Easy, Inc. and tips at Coup Platte Hunting and Fishing Camp.

8. Identify the office of Internal Revenue Service to which you have submitted United States income tax returns for the period mentioned in Interrogatory No. 6, state the total amount of gross income you reported annually for such period, and, if your gross income included any sums other than earnings, state the amounts and nature of such other income.

**Answer to Interrogatory No. 8:**

See income tax returns attached to responses to requests for production.

9. What is the nature of the injury or illnesses which you suffered as alleged in your Complaint?

**Answer to Interrogatory No. 9:**

Aggravation of bipolar disorder, post-traumatic stress disorder, migraine headaches, sleep paralysis, humiliation and embarrassment, disgrace, depression, anxiety, paranoia, suicidal ideations, and attempted suicide. The bipolar disorder, although diagnosed subsequent to the incidents, was determined by Dr. Greg Hunter to have preexisted the incidents and to have been aggravated by the incidents. The symptoms of the bipolar disorder, to Mr. Trahan's recollection, had never manifested themselves prior to the incidents. The recurrence of severe depression, with the need for medications to control it, immediately followed the incidents and, according to Mr. Trahan's treating psychiatrists, the depression was aggravated by the incidents. Although Mr. Trahan had been

diagnosed with depression many years prior to the incidents, that condition had been fully under control without the need for medication for at least four years prior to the incidents. Mr. Trahan does not know if any of these conditions are permanent. However, all of the conditions persist and he continues to undergo treatment and take medication in an attempt to alleviate or control such conditions. So far, only partial control, at best, has been obtained. See Exhibit 1, Medicals attached to responses to accompanying Requests for Production.

10. Please state if you have performed any work subsequent to the alleged injury or illness forming the basis of this action and list in detail the type of work performed as well as where, when, and for whom it was performed.

**Answer to Interrogatory No. 10:**

See attached list styled "Employment Since Incident."

11. Do you claim that any injury referred to in the Complaint caused or contributed to the aggravation of a pre-existing physical, nervous, or mental condition? If your answer is in the affirmative, please state the nature of the pre-existing condition, the manner in which and the date such condition originally arose or who caused, and the date you first became aware that the injury referred to in the Complaint had caused an aggravation of such pre-existing condition.

**Answer to Interrogatory No. 11:**

See response to Interrogatory No. 9 above.

12. State the name and address of each doctor, physician, surgeon, chiropractor, osteopath, clinic, hospital or other health care provider who/which examined or treated you during the ten year period preceding the date of your answers to these interrogatories. For each such person listed, state the physical, nervous, or medical condition complained of, the circumstances involved, the medication and treatment received, and the residual effects, if any, and whether any of these individuals are still treating you.

**Answer to Interrogatory No. 12:**

See attached list styled "Medical Information. From Birth to Present."

13. During the ten year period mentioned in Interrogatory No. 12, were you on any occasion confined to a hospital or clinic for medical treatment? If your answer is in the affirmative, state all details concerning each such confinement, including the name and address of each such hospital or clinic, the dates of admission and discharge, the name and address of each attending physician, and the nature of the treatment rendered.

**Answer to Interrogatory No. 13:**

During the last ten years, Mr. Trahan has received treatment at River Oaks Hospital, Harahan, LA, for depression and suicidal ideations during or about April to May 2005. He was treated as an in-patient, underwent therapy, and received medications. He was also treated at St. Anne General Hospital, Raceland, LA, for depression and suicidal ideations as an in-patient during or about October 2005, where he was provided therapy and medications. Copies of all documentation currently in the possession of Mr. Trahan or his undersigned counsel regarding treatment dates, hospital, doctor, nursing, and drug bills are annexed to Mr. Trahan's responses to requests for

production of documents. Recently, Mr. Trahan was admitted for 72 hours to Lafayette General Medical Center for evaluation and treatment in connection with his attempted suicide.

14. If you were hospitalized or treated on an outpatient basis for the alleged injury referred to in the Complaint, please state for each such hospitalization or outpatient treatment the name and address of the hospital, clinic, or treatment center, the dates of treatment and/or admission or discharge, the name and address of each attending physician and of any other physicians who examined and/or treated you during such confinement, the injury treated, and the nature of such treatment.

**Answer to Interrogatory No. 14:** \

Mr. Trahan was treated at River Oaks Hospital and St. Anne General Hospital as discussed in response to Interrogatory No. 13 above. The physicians or psychologists who have treated him for the injuries arising out of the incidents complained of herein were:

- (i) Dr. Brian Matherne, M.D., 291 Liberty Street, Houma, LA 70360. During or about December 2004 to January 2005 he treated Mr. Trahan for depression and other symptoms suffered as a result of the incidents, provided medications (Effexor 100mg once a day, Klonopin 1mg twice a day), and referred Mr. Trahan to Dr. Greg Hunter, a psychiatrist. Dr. Matherne also diagnosed and treated Mr. Trahan for Bell's Palsy prior to the incident complained of herein.
- (ii) Dr. Greg Hunter, M.D., psychiatrist, 846 Verret Street, Houma, LA 70360; treated Mr. Trahan from about February 2005 until about June 2005, diagnosed him as bipolar and suffering from post-traumatic stress disorder, prescribed medications

(Zoloft 100mg once a day, Risperdal 2mg twice a day), determined that Mr. Trahan should not be permitted to return to work. Treatment discontinued when Mr. Trahan ran out of insurance coverage and could not afford to pay.

- (iii) Dr. Suzanne Vega, M.D., psychiatrist, Terrebonne Mental Health Center, 106 Moss Lane, Houma, La., 70360, phone: 985-857-3615; treated Mr. Trahan from mid-2005 until approximately early 2006, diagnosed Mr. Trahan as bipolar with post-traumatic stress disorder, placed him on medication (Zoloft 100mg once a day, Risperdal 2mg twice a day, Elavil 25mg once at night, Seroquel 300 mg once at night) and classified him as disabled.
- (iv) Ted Bergeron, counselor, Terrebonne Mental Health Center, 106 Moss Lane, Houma, La., 70360, phone: 985-857-3615; provided mental health counseling from about mid-2005 to early 2006.
- (v) David Regan, M.D., psychiatrist, Tyler Mental Health Center, 302 Dulles Dr., Lafayette, LA 70506, phone: 337-262-4190; treated Mr. Trahan from about March 2006 through present date, provided psychotherapy and prescribed medications (Zoloft 100mg once a day, Seroquel 300 mg once at night, Lithium Carbonate ER 450mg two times a day).

15. Did you visit any physician; surgeon, dentist, or any other medical person, including a chiropractor and/or osteopath, for examination or treatment of any injury, ailment, or other condition referred to in the Complaint? If your answer is in the affirmative, please state as to each such person, his name and address; the specialty of such person; the dates, time and place of each

such visit; the injury, ailment, or condition treated or examined; and a description of the treatment, examination, consultation, or surgery.

**Answer to Interrogatory No. 15:**

See list of physicians and counselor listed in response to Interrogatory No. 14 above.

16. Prior to your alleged injury or illness, were you receiving regular doses of any drug and have you used any drug or medication in connection with an injury or condition referred to in the Complaint? If your answer is in the affirmative, please state the name of the drug, the reason for taking the drug, the prescribed dosage, the name and address of the physician who prescribed the drug, and whether or not you are still taking the drug.

**Answer to Interrogatory No. 16:**

Immediately prior to the incidents complained of, Mr. Trahan was not receiving medications for any injury or condition referred to in the Complaint. Prior to the incidents, the last time he received medications for depression or any other mental health problems was in the year 1999; Mr. Trahan cannot recall the medications he received at that time.

17. Have you ever been involved in an accident either prior to or subsequent to the accident referred to in the Complaint? If your answer is in the affirmative, please state for each such accident the date, place of occurrence, the name and address of the other person or persons involved in or at the scene of the accident, the name of your employer at the time, a description of any personal injuries of any type of that you may have received in any such accident, the name and address of each and every doctor, physician, surgeon, chiropractor and/or osteopath, clinic, hospital

or other health care provider who/which examined and/or treated you as a result of said injuries, and whether such injuries were disabling and, if so, whether such disability was temporary and/or permanent.

**Answer to Interrogatory No. 17:**

Norman Trahan was involved in an automobile accident in Lafayette, LA on February 25, 2006, in which he received injuries that were treated at the Our Lady of Lourdes Hospital emergency room in Lafayette, LA, at which he was given medication and discharged. He was further treated for these injuries at University Medical Center in Lafayette, LA, where tests were run and it was determined that he had suffered fractured ribs. Mr. Trahan will attempt to locate any records regarding details of his treatment for injuries sustained in this accident and will provide same in a supplemental response and/or will provide a medical information release. He was not disabled as a result of injuries suffered in the accident. At the time of that accident, Mr. Trahan was not employed. The accident involved a collision between two vehicles, one driven by Mr. Trahan. Anna Levy was his passenger; her address is 220 Wilkie Street, Apt. 862, Lafayette, LA 70506. The other vehicle was driven by Leon Boutte, address: 107 Lene St., Lafayette, La. 70501, phone number unknown. Mr. Boutte's passenger was Kayla Cormier, address: 1106 Moss St., #35, Lafayette, La. 70501, telephone; 337-766-7191. Mr. Trahan has not received any disability benefits, pension or other remuneration in connection with that injury. To date, although he has a claim pending, Mr. Trahan has not filed suit.

Mr. Trahan suffered a fractured left arm caused by a fall during recess in elementary school (precise date unknown). His arm was casted, with no subsequent ill effects or disabilities. He was treated by Dr. Tommy Haydel, now deceased, his family doctor in Houma, LA. He does not recall

whether he received medications for the injury. He did not receive any disability benefits, pension or other remuneration in connection with that injury. No lawsuit was filed.

18. Other than this proceeding, have you ever filed a suit or asserted a claim to recover damages or statutory benefits for injury or illness? If your answer in the affirmative, for each such action please state the date, name and address of the court, administrative agency, or governmental agency in which suit and/or claim was filed and/or asserted, and docket number; the name and address of each party that you sued; the name, address, and telephone number of the attorney who represented you; the name, address, and telephone number of the attorney who represented each defendant; when and how you suffered each alleged injury or illness; what injuries and/or illnesses you suffered; and which suits have terminated and the gross amount received by you in each case.

**Answer to Interrogatory No. 18:**

Yes, suit filed in matter related to this proceeding, styled "Norman Paul Trahan vs. BP America, Inc., et al." 19th Judicial District Court, Parish of East Baton Rouge, Case No. 538,643, Section 25. Additionally, Mr. Trahan filed Title VII charges that are pending with the New Orleans office of the EEOC; that matter is also based on facts that relate to the herein proceeding.

19. Please state whether you have received or filed for unemployment benefits or compensation, or for any worker's compensation, disability or similar benefits from any person, firm, association, partnership, corporation, governmental agency, or other entity. If your answer is in the affirmative, please state the name and address of the person, firm, association, partnership, corporation, governmental agency, or other entity involved, the nature and amount of the

compensation or benefits, the period for which compensation or benefits were paid, and a detailed description of any injuries, illness, or conditions for which compensation was paid.

**Answer to Interrogatory No. 19:**

Yes. Mr. Trahan received maintenance and cure payments from Laborde Marine Lifts at the rate of approximately \$15.00 per day from approximately January 2005 through June 2005. Mr. Trahan has also received, and continues to receive, social security disability payments since June 2005. Initially, his benefits were \$606.00 per month, and have recently been increased to \$623.00 per month.

20. State in detail the date and place you allege the accident forming the basis of the Complaint occurred and your specific activities on the date involved prior to and subsequent to the time of the accident including, but not limited to, the time of day, the prevailing weather conditions, your supervisor's name and position, the name of any personnel assisting and/or working with you, safety equipment utilized and/or available, and the exact sequence of events leading up to and following the accident.

**Answer to Interrogatory No. 20:**

The incidents complained of herein commenced and/or initially came to the attention of Mr. Trahan on December 6, 2005, at about 8:00 o'clock p.m. in the day room aboard the M/V LAB LIFT IV in the Gulf of Mexico off of the coast of Louisiana. The weather was cold and windy. Mr. Trahan was watching Monday Night Football on TV and checking his email. His supervisor at the time was Capt. Gary Eaton, the vessel captain. See paragraphs 2 through 14 of Mr. Trahan's

Complaint filed in this proceeding for a full description of the incidents. The following is a list of persons that Mr. Trahan recalls as having been in attendance in the day room at the aforesaid time:

- a. Captain Gary Eaton (employed then and now by Laborde Marine Lifts, Inc., believed to be living at unknown address in Pass Christian, MS).
- b. Norman Paul Trahan.
- c. Ben Griffin (employed then and now by Halliburton, lives at 1103 East Camellia Drive, Thibodaux, LA 70301).
- d. Harris J. Dufrene, III (employed then and now by Halliburton, believed to be living at unknown address in Des Allemands, LA, cell phone: 504-415-2810).
- e. Don Johnston (employed then as E-Line Technician by Halliburton, now employed by Superior Energy Services, Harvey, LA), 280 Bobby Lane, Picayune, MS 39466, phone: 601-569-1394).
- f. Ian Maynard (employed then and now as supervisor by Halliburton, lives at unknown address in Houma, LA).
- g. Perry Lafont (employed then as supervisor by Halliburton, and probably still employed by Halliburton, lives at unknown address in south LA).
- h. African-American male employed as pump operator by Halliburton, address unknown.
- i. Jerry Blackwood (employed then as pump operator by Halliburton, now employed by Superior Energy Services), lives at unknown address in Westlake or Lake Charles, LA).

- j. Brad Sanner (employed then in general maintenance by Major Equipment, now employed by Halliburton), lives at unknown address in Morgan City, LA, phone: 985-397-1912).
- k. Jerry Berger (employed then as pump operator by Halliburton, and probably still employed by Halliburton, lives at 581 Oregon Street, Berwick, LA 70342).
- l. Joshua Youngblood (employed then as wellhead supervisor by Weatherford, and probably still employed by Weatherford, lives at 1311 B&B Avenue, Eunice, LA 70535).
- m. John Conover (employed then as scaffold supervisor by Brand Scaffold, and probably still employed by Brand, lives at 300 Strasbourg Drive, Lafayette, LA 70506).
- n. Steve Whiddon (employed then by Eagle Consulting as the BP company representative aboard the vessel, and may still be employed by Eagle), lives at unknown address in north Texas, phone: 361-576-3576.
- o. Fernando Celestino (employed as safety coordinator by Fire Safety Specialists, 320 Broussard Road, Lafayette, LA 70506, lives at 100 Ravine Run Drive, Lafayette, LA 70506, phone: 337-981-4995).
- p. Chad Ragas (ex-Halliburton employee, 822 W. St. Peter Street, New Iberia, LA 70560, phone: 337-560-9158).
- q. Jeff Turner (employed by Laborde Marine), 211 Republic Avenue, Apt. 518, Lafayette, LA 70508, phone: 337-739-2822.
- r. Oscar Guerrero (employed as tong operator by Weatherford), lives at unknown address in south Texas, phone: 361-289-5111.

- s. Dustin Gonzales (employed by Brand Scaffold), address unknown, phone: 409-724-2579.
- t. Bruce Beacon (employed by Halliburton), lives at unknown address in Houma, LA.
- u. Tyler Lege (employed by Fire Safety Specialists), address unknown, work phone: 337-993-9377.
- v. Fred (last name unknown, employer unknown), dispatcher and medic on vessel.
- w. Bobby Guidry (employed then by Laborde Marine Lifts, now retired), lives at unknown address in Cutoff, LA.
- x. Mitchell Sargent (employed by Laborde Marine), address unknown, phone: 318-767-0688.
- y. Ron Chaisson (employed by Halliburton), lives at unknown address in Houma, LA.
- z. Kirk Portier (employed by Halliburton), lives at unknown address in Houma, LA.
- aa. Aaron Ribarde (employed then by Major Equipment), lives at unknown address in Morgan City, LA, phone: 985-518-0140.
- bb. Larry Ribarde (employed then by Major Equipment; no longer there), 12 Chennault, Morgan City, LA 70380, phone: 985-399-8837, 985-860-4905.
- cc. Larry Rodgers (employed by Laborde Marine), 2991 Curtis Street, Memphis, TN 38118, phone: 901-647-9795.
- dd. Jeff (last name unknown), employed by Laborde Marine.

21. State exactly how you contend that your accident occurred and state in detail the specific basis upon which you claim that the defendant was negligent or the vessel was unseaworthy

in respect to your accident, and if you claim your injuries were occasioned by any acts or action of negligence and/or carelessness on the part of the defendant's servants, agents, or employees, give the name and/or the capacity of each servant, agent, or employee whom you claim was negligent and state specifically in detail each and every alleged negligent and/or careless act of each of the servants, agents, or employees so named.

**Answer to Interrogatory No. 21:**

See response to Interrogatory No. 20 above.

22. Please state whether you are claiming as an element of damages in this action, either future loss of earnings due to impaired earning ability, or future medical expenses.

**Answer to Interrogatory No. 22:**

Yes. Mr. Trahan is claiming both future loss of earnings and future medical expenses as elements of his damages.

23. Set forth the name and address of each and every person who witnessed your alleged accident, injury, illness, or the symptoms thereof, including, but not limited to, eyewitnesses and factual witnesses, and state whether you, your attorney, or anyone else acting on your or your attorney's behalf has interviewed or taken any statements from witnesses or any other persons relating in any way to this matter. For each interview or statement, please describe whether it was recorded, transcribed, written, and/or otherwise, the party who gave the interview or statement, the individual who obtained the interview or statement, the date which the interview or statement was taken, where it was taken, who is currently in possession of the statement and/or notes of interview,

whether or not the individual who gave the interview or statement was given a copy, and whether you will voluntarily attach a copy of each such statement and/or interview notes to your answers to these interrogatories.

**Answer to Interrogatory No. 23:**

Undated, written statement obtained from Harris J. Dufrene III (phone: 504-415-2810), which was also signed by Steve Whiddon (phone: 361-576-8576) and Norman Trahan. During the evening of December 7, 2004, Mr. Trahan was called into a meeting in Steve Whiddon's office which was attended by Mr. Whiddon, Perry Lafont and Harris J. Dufrene, III. In the presence of Mr. Trahan, the on-land Halliburton supervisor, Collis Odom, was contacted by telephone and the ensuing conversation was carried on the speaker phone. Mr. Trahan listened to the conversation, but did not participate. Mr. Odom was given a brief synopsis of the incidents involving Mr. Trahan and was told that there was a possibility that Halliburton employees were involved. Mr. Odom ordered Mr. Dufrene to type a statement. Subsequent to the meeting, Mr. Dufrene typed the statement without the input or participation of Mr. Trahan. The next morning, before any announcement of the drug testing was made, but in anticipation of the arrival of the drug testing personnel, all of the persons onboard, including those who were sleeping, were summoned to a meeting in the day room. While in the day room, Mr. Trahan was summoned to a table on which the typed statement of Mr. Dufrene had been placed. He was told by Mr. Whiddon and Mr. Dufrene that the statement had been transmitted to Mr. Odom, and that Mr. Odom had approved it. In the presence of Mr. Trahan, the statement was signed by Mr. Dufrene and Mr. Whiddon and then passed to Mr. Trahan for his signature. Mr. Trahan felt he had no choice but to sign the statement, particularly considering that he was still being held aboard the vessel against his will and he feared that his failure to cooperate

would simply prolong the time that he would have to remain aboard. Mr. Trahan placed his signature on the statement believing that his signature indicated not that he was verifying the accuracy of its content, but that he had been shown the statement and had seen Mr. Dufrene sign it.

Undersigned counsel for Mr. Trahan did interview Don Johnston regarding the incidents complained of herein, but counsel is uncertain of the date of such interview. The interview with Mr. Johnston was not recorded, transcribed, or written. Mr. Johnston was aboard the vessel and in the vessel's day room at the time of the incidents complained of herein and, during the interview, he confirmed as accurate the factual allegations made by Mr. Trahan in this proceeding regarding the incidents.

Jeff Fagenbush (address unknown), Safety Coordinator for Laborde Marine Lifts, interviewed and is believed by Mr. Trahan to have taken written statements from all of the men who served on the same 12-hour shift as Mr. Trahan. The statements were taken aboard the vessel during or about December 8, 2004. Mr. Trahan does not know if the statements were recorded on audio or video tape, but believes that all of the statements were done with pen and paper on Laborde's incident report forms. If the statements were electronically recorded, Mr. Trahan does not know if such recordings were transcribed. Mr. Trahan does not know the present location of any transcription of recorded statements, nor the names and business addresses of any person having custody or control of any such transcription. Mr. Trahan only has a copy of his own statement obtained by Laborde and the statement of Harris Dufrene; see statements attached to accompanying responses to requests for production. Also, see report of Dr. Greg Hunter attached to responses to accompanying requests for production.

The persons believed by Mr. Trahan to have witnessed the incidents complained of herein are listed in his response to Interrogatory No. 20 above. Additionally, the following persons are witnesses to the injury, illness and/or the symptoms suffered by Mr. Trahan:

- (i) Anna Levy, 220 Wilkie Street, Apt. 862, Lafayette, LA 70506.
- (ii) Tanya Quinn (ex-wife), lives on J Circle in Houma, LA, phone: 985-232-8594.
- (iii) Cliff Hale (current employer), 304 Genevieve Drive, Lafayette, LA 70503, phone: 337-258-6090.
- (iv) Mark Landry (best friend), 13 Cobblestone West, Houma, LA 70360, phone: 985-223-0966.
- (v) Dr. Richard Landry (Mark Landry's father and also close friend), retired orthopaedist (but has not treated Mr. Trahan), Bayou Black Drive in Houma, LA.
- (vi) Dr. Brian Matherne, M.D., 291 Liberty Street, Houma, LA 70360; treated Mr. Trahan for depression and other symptoms suffered as a result of the incidents, provided medications, and referred Mr. Trahan to Dr. Greg Hunter, a psychiatrist. Dr. Matherne also diagnosed and treated Mr. Trahan for Bell's Palsy prior to the incident complained of herein.
- (vii) Dr. Greg Hunter, M.D., psychiatrist, 846 Verret Street, Houma, LA 70360; treated Mr. Trahan during most of 2005, diagnosed him as bipolar and suffering from post-traumatic stress disorder, prescribed medications, determined that Mr. Trahan should not be permitted to return to work. Treatment discontinued when Mr. Trahan ran out of insurance coverage and could not afford to pay.

- (viii) Dr. Vega, M.D., psychiatrist, Mental Health Clinic of Terrebonne, Houma, LA; treated Mr. Trahan from late 2005 until approximately August 2006, diagnosed Mr. Trahan as bipolar with post-traumatic stress disorder, placed him on medication and classified him as disabled.
- (ix) Mr. Ted Bergeron, counselor, Mental Health Clinic of Terrebonne, Houma, LA.
- (x) Dr. Regan, M.D., psychiatrist, Henry Tyler, Jr. Mental Health Center, Dulles Street, Lafayette, LA; treated Mr. Trahan from August 2006 through present date, maintained him on same medications prescribed by previous psychiatrist (Zoloft and Seroquil), and added Lithium, a mood stabilizer.
- (xi) Michael D. Trahan (brother), 1311 Academy St., Houma, La. 70360; phone: 985-223-1990.
- (xii) Sybil M. Trahan (mother), 817 High St., Houma, La. 70360; phone: 985-879-3630.

24. Do you or does anyone acting on your behalf have information concerning the existence of any photograph, statement, motion picture, sketch, blueprint, drawing, model, etc. of the vessel or area where your alleged injury or illness occurred, or of any gear, appliance, piece, part, or thing which you alleged caused an injury or illness, which was taken, drawn, accomplished, ordered, or in any way secured for the purposes of this litigation or as a result of your alleged injury or illness? If your answer is in the affirmative, state the source of such information, the identity of each photograph, statement, motion picture, etc., and as to each, the date, time, and occasion rendered, and the name, address, occupation, and employer of the person or person taking, rendering

and/or currently in possession of such materials or copies thereof, and a description of what each photograph, motion picture, etc. purports to depict.

**Answer to Interrogatory No. 24:**

See Exhibit 9, Web Posting and Photographs, attached to responses to requests for production of documents.

25. Please list each and every witness which you expect to call at trial, and each and every expert witness who has been retained or consulted by you or your attorney, whether or not that expert is expected to be called at trial. For each please state their name, address, field and/or profession, office address, the subject matter on which he is expected to testify, the substance of the facts and opinions to which each expert is expected to testify, and state a summary of grounds for each expert opinion, and if they have rendered reports, report letters, memoranda, other documents, or taken photographs, for each item please state the date, place and time rendered, and any other person or entity to whom these reports, memoranda, report letters, or other documents were made or given, the substance of each and every report, a description of each photograph, and who presently has possession of each report, memoranda, report letter, or photograph.

**Answer to Interrogatory No. 25:**

Mr. Trahan may or will call the witnesses listed in his response to Interrogatory No. 20 above; those persons are fact witnesses who would testify about the incidents complained of herein and the conditions aboard the vessel that led to the incidents. Mr. Trahan may or will call the witnesses listed in his response to Interrogatory No. 23 above. Anna Levy, Tanya Quinn, Cliff Hale, Mark Landry, Dr. Richard Landry, Michael D. Trahan and Sybil M. Trahan are fact witnesses who

would testify about the injury, illness and/or symptoms thereof suffered by Mr. Trahan. Dr. Brian Matherne, Dr. Greg Hunter, Dr. Vega and Dr. Regan, psychiatrists, and Mr. Ted Bergeron, counselor, treated Mr. Trahan for the illness and/or injuries sustained as a result of the incidents; they are experts who are expected to testify that Mr. Trahan's injury, illness and/or symptoms were caused and/or exacerbated by the incidents complained of herein. They will also describe and define such injury, illness and/or symptoms, the treatment they rendered or are presently rendering, and their prognosis. Other than the records of such mental health care providers and the report of Dr. Hunter that are attached in response to the requests for production propounded by Laborde Marine Lifts, Inc., neither Mr. Trahan nor his counsel have obtained any reports from such experts. Undersigned counsel did interview Dr. Hunter briefly on the telephone sometime during the spring of 2005, but no written or otherwise recorded statement was obtained. No other experts have been retained yet by or on behalf of Mr. Trahan, but it is anticipated that he will retain an economics expert and an expert in rehabilitation and/or occupational therapy.

Respectfully submitted:

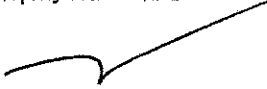
**GERALD WASSERMAN, LLC**

By:

\_\_\_\_\_  
Leonard M. Berins (#3004)  
Gerald Wasserman (#13253)  
3939 N. Causeway Blvd., Suite 200  
Metairie, LA 70002  
(504) 846-5700  
(504) 846-5719 Fax  
*Attorneys for Plaintiff Norman Paul Trahan*

**CERTIFICATE OF SERVICE**

I hereby certify that I have on 12/29/06  
served a copy of the foregoing pleading on counsel for  
all parties to these proceedings, by mailing the same via  
the United States Postal Service, properly addressed and  
first class postage prepaid.



\_\_\_\_\_  
**LEONARD M. BERINS**

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# LABORDE MARINE LIFTS, INC.



## STATEMENT FORM

ON VESSELS ENGAGED IN U. S. OPERATIONS, THIS FORM IS TO BE COMPLETED BY EVERY CREW MEMBER, INCLUDING THE MASTER, AND/OR WITNESSES WITH RESPECT TO PERSONAL INJURIES ONLY (NEED NOT BE COMPLETED FOR ILLNESS) ON ALL OTHER VESSELS, THIS FORM IS TO BE COMPLETED BY CREW MEMBERS AT THE MASTER'S DISCRETION.

(1) Your Name <b>Gary Eaton</b>		(2) Home Address <b>4179 Ireland ST</b>		(3) Home Telephone No. <b>278-466-9501</b>	
(4) Age <b>49</b>	(5) Nationality <b>US</b>	(6) Social Security No./Passport No. <b>307-02-8004</b>		(7) Job Title <b>Captain</b>	
(8) Name of Vessel to which You are Assigned <b>Lab Lift II</b>			(9) Employed By (Name and Address of Company) <b>Laborde Marine</b>		
(10) Name of Person Injured			(11) Date of Occurrence		(12) Time of Occurrence
(13) Location Where Injury Occurred					

### STATEMENT

(14) 12/6/04 FSS man approached me and said he had been told by Majors Equipment man Brad Sanner that Norman Trahan had asked Brad where a good place to get high on the boat was. He was also suppose to have told him he had Cocaine and Pot on board. I let FSS man Tyler Legg<sup>hno</sup> that this was hear say and I would look in to this. I confronted Norman the next day of what I had heard and that this was against company policy. He neither would denie this or confirm this to me. I discussed this with our office and they asked me if he appeared to be on drugs and told them it didn't appear like it to me. Then last night I found out that someone had posted an add on a gay web site without him knowing he acted up set. I informed Holliburton Supervisor Harris Dufrene about this he said he would handle it. When I got up to run crane at 3:00 Am he had his bag packed and wanted to know if he could go home then. I told him he should have let me know earlier so I could have called for a relief for Him. He said he would stay but wanted to go home as soon as he could two hours later he said he quit send me home. Now the Vessel is on Lock down

(15) In Your Opinion, What was the Cause of the Accident?

(16) Signature *[Signature]*

(17) Date