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On Behalf of Plaintiffs' Executive Committee

Baum, Hedlund, Aristei, Guilford & Schiavo  
Baumeister & Samuels, P.C.  
Hanly & Conroy, LLP  
Ness, Motley, P.A.  
Speiser, Krause, Nolan & Granito  
Warden, Triplett, Grier, P.A.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
: 21 MC 97 (AKH)  
IN RE SEPTEMBER 11, 2001 LITIGATION :  
: This Documents Relates  
: to: All Cases  
-----X

**PLAINTIFFS' MASTER DISCOVERY**  
**(FIRST SET)**

**TO: ALL DEFENDANTS**

PLEASE TAKE NOTICE that pursuant to Rules 33, 34 and 26, Federal Rules of Civil Procedure, the plaintiffs' hereby require defendants to submit under oath, separate, complete and written answers to each of the following interrogatories and produce the following documents and things for inspection and copying at a time to be determined by the Court following the January 24, 2003 conference, at the office of Kreindler & Kreindler, 100 Park Avenue, New York, New York 10017.

**DEFINITIONS, INSTRUCTIONS AND RELATED MATTERS:**

1. In the event that production of any document or thing requested by Plaintiffs is objected to by Defendants, Plaintiffs request that Defendants:
  - a. Produce sealed copies of such materials so as to permit an in camera inspection of said documents, so that the appropriateness of production can be promptly determined by the Court;
  - b. State the specific grounds upon which your objection is based with respect to each document or category of documents and things for which production is requested and to which there is an objection; and,
  - c. Identify each document withheld or any portion(s) withheld by setting forth, as applicable, for each:
    - (i) the date;
    - (ii) the author and/or signatory;
    - (iii) the type of document (e.g., letter, chart, memorandum, etc.);
    - (iv) the number of pages;
    - (v) a summary of its contents or the nature of the document;
    - (vi) its present location and custodian; and,
    - (vii) a listing of all persons who are known to or believed to have received copies of it.
  - d. Notwithstanding the assertion of an objection, any purportedly privileged document containing non-privileged matter must be disclosed, with the purportedly privileged portion excised.

2. The terms "you," and "your" refer to any Defendants in this action to which this discovery may be directed and any of their affiliates, facilities, locations, divisions, predecessors or successors-in-interest, general partners, limited partners, subsidiaries, administrators, agents, servants, employees, investigators, attorneys or other representatives.

3. The terms "person or "persons" refer to natural persons, proprietorships, governmental agencies, corporations, partnerships, trusts, joint ventures, groups, associations, organizations and all other entities.

4. Whenever you are asked to identify a document, state:

- a. A description of the nature of the document sufficient to identify it;
- b. A physical description including the number of pages;
- c. The date of the document;
- d. The identity of each and every person to whom the document was directed;
- e. The identity of the persons by whom it is signed or subscribed, if any;
- f. The present or last known location of the original and all copies;
- g. The identity of the person with present custody of the original and all copies;
- h. If any such document was but no longer is in the defendant's possession, custody, or control, state the disposition that was made of such document, the reason for such disposition and the date thereof.

5. The use of the singular shall be deemed to include the plural, and the use of one gender shall include all others, as appropriate in the context.

6. The terms "document," "materials" and/or "literature" are to be used in the broadest possible sense and mean, without limitation, any written, printed, typed, photostatic, photographed, recorded or otherwise reproduced communication or representation, whether comprised of letters, words, numbers, pictures, sounds or symbols, or any combination thereof. This definition includes copies of duplicates of documents contemporaneously or subsequently created which have any non-conforming notes or other markings. Without limiting the generality of the foregoing, "document" includes, but is not limited to, all writings, correspondence, memoranda, notes, records, letters, envelopes, e-mails, faxes, telegrams, messages, studies, analyses, contracts, agreements, working papers of all kinds, statements, entries, ledgers, balances, reconciliations, accounts, analytical records, reports, summaries of investigations, trade letters, press releases, comparisons, books, calendars, diaries, articles, magazines, newspapers, booklets, brochures, pamphlets, circulars, bulletins, notices, drawings, diagrams, instructions, notes or minutes of meetings or of other communications of any type, including inter and intra-office communications, questionnaires, surveys, charts, graphs, papers, indexes, data sheets, forms, manuals, lists, photographs, phonograph recordings, films, tapes, discs, data cells, drums, printouts of information stored or maintained by electronic data processing or word processing equipment, all other data compilations from which information can be obtained (by translation, if necessary, by you through detection devices into usable form) including, without limitation, electromagnetically sensitive storage media such as

floppy disks and hard disks, and any preliminary versions, drafts or revisions of any of the foregoing.

7. The terms "refer" or "relate" or "referring" or "relating" or "related" or "regarding" or "pertain" or "pertaining" or "evidencing" mean all documents which comprise, explicitly or implicitly refer to, were reviewed in conjunctions with, or were created, generated or maintained as a result of the subject matter of the request, including, but not limited to, all documents which reflect, record, memorialize, embody, discuss, evaluate, consider, review, or report on the subject matter of the request.

8. The term "employee" refers to any individual currently in the employ of, or at any time employed by you or any other party to this litigation.

9. The terms "meeting" or "conference" or "lecture" mean the contemporaneous presence of any natural persons, whether or not such presence was by chance or prearranged, and whether or not the meeting was formal or informal or occurred in connection with some other activity.

10. The term "communication" means any and all documents relating in any way to transmission or exchange of information between two or more persons or entities, orally or in writing, and includes, without limitation, any conversation or discussion, whether face-to-face or by means of telephone, telegraph, e-mail, fax, telex, telecopier, electronic or other medium.

11. If a document has been prepared in several copies, or additional copies have been made over time, and the copies are not identical (by reason of subsequent modification, revision, or by the addition of notations or other markings including, but not limited to, underlining, showing of blind copies, crossing out, initialing, comments,

signatures, documents clipped or stapled thereto, etc.), Plaintiffs request production of each non-identical copy as a separate document for purposes of this request.

12. The terms the “subject flights and/or crashes” and/or “hijacked aircraft” refer to United Airlines Flight 93, United Airlines Flight 175, American Airlines Flight 11 and American Airlines Flight 77 of September 11, 2001.

13. The term “subject aircraft” refers to the aircraft which are the subject of this litigation and operated as the “subject flights and/or crashes” and/or “hijacked aircraft” referenced in the preceding paragraph, including all component parts installed thereon.

14. The term “subject crashes” as it relates to the building defendants refers to the crash of American Airlines Flight 11 into One World Trade Center and United Airlines Flight 175 into Two World Trade Center on September 11, 2001.

15. The term “subject fires” refers to the fires which occurred in One World Trade Center and Two World Trade Center following the subject crashes on September 11, 2001.

16. The term “subject buildings” refers to One World Trade Center and Two World Trade Center.

17. The term “subject collapses” refers to the collapse of One World Trade Center which occurred at approximately 10:28 a.m and the collapse of Two World Trade Center which occurred at approximately 9:59 a.m., on September 11, 2001.

18. The term structural systems includes but is not limited to the external and internal columns, core area, floor deck assemblies, tower beams, girders, bar joists,

trusses, truss seats, spandrels, bolt, weld, plate or truss connections, fasteners, dampers and any other major structural components for the subject buildings.

19. Documents produced in response to one specific paragraph of this request need not be produced again, provided they are designated as being responsive to subsequent specific paragraphs when they are first produced.

20. You are required to produce all of the requested documents which are in your possession, custody or control (or right to control), including (by way of illustration only and not limited to) documents in the possession, custody or control of your affiliates, or merged and acquired predecessors and your present or former investigators, attorneys, directors, officers, partners, employees or other agents, as well as your present or former independent contractors over which you had control, and any other person acting on your behalf.

21. The terms "identification" or "identity" shall or "identify" mean:

- a. As to an individual, state his or her:
  - (1) Full and customarily used names;
  - (2) Present residence address and business address;
  - (3) Residence address and business address during the relevant time period;
  - (4) Business or professions during the relevant time period;
  - (5) Every office, title, or position held during the relevant time period;

- (6) Every employer during the relevant time period, stating the name and present or last known address of each such employer.
- b. As to any person other than an individual, state:
- (1) Its legal name and any other names used by it;
  - (2) The form or manner of its organization (e.g., partnership, corporation, etc.);
  - (3) The state of its incorporation (if it is incorporated) and the address of its principal place of business;
- c. As to a document, state:
- (1) The date of its creation, execution, and receipt;
  - (2) Its author or signatory;
  - (3) The name and present business address of each person having knowledge of any of the assertions reflected in such documents;
  - (4) Its type or nature (e.g., letter, memorandum, stated with particularity);
  - (5) The description of the document in sufficient detail to enable it to be specifically identified:

- (6) The name and address of the person presently having custody of the document;
  - (7) If any document, identification of which is sought, has been lost or destroyed, state in addition to the information required above whether such document was (a) lost or (b) destroyed, and if lost, state the circumstances under which such document was lost, and if destroyed, identify each person responsible for or participating in such document's destruction.
- d. As to an event, transaction, representation, conversation, or occurrence, state:
- (1) Its date;
  - (2) The place where it took place and the manner of its occurrence (e.g., face-to-face meeting of participants, telephone calls, etc.);
  - (3) The identification of all its participants and eyewitnesses to its occurrence;

- (4) The present business position and business address of all its participants and eyewitnesses to its occurrence;
- (5) Its purpose and subject matter;
- (6) A complete description of the substance of the event, transaction, conversation or occurrence.

22. These Requests are continuing so as to require supplemental production pursuant to the Federal Rules of Civil Procedure. If, after making your initial production, you or any person acting on your behalf obtains varying or additional information or documents called for by the requests, all such original information and documents shall be made available to plaintiffs and their counsel.

23. If any otherwise responsive document was, but is no longer in existence or in your possession, custody or control, identify its current or last known custodian, the location/address of such document, and describe in full the circumstances surrounding its disposition from your possession or control.

24. Documents produced pursuant to this request shall be labeled to indicate the specific paragraph(s) of the request to which they respond.

25. In construing these requests, the singular shall include the plural and the plural shall include the singular.

26. Any pronoun means the masculine, feminine, and neuter gender and the singular or plural as in each case may be appropriate.

27. The use of a verb in any tense shall be construed as the use of the verb in all tenses as is necessary to bring within the scope of any request all responses that might otherwise be construed to be outside its scope.

### **REQUEST FOR PRODUCTION**

#### **REQUEST NO. 1:**

Produce the approved security program (“ACSSP”) for American Airlines (“American”) and United Airlines (“United”) applicable to Logan International Airport (American Flight 11 and United Flight 175), Newark International Airport (United Flight 93), Dulles International Airport (American Flight 77) and for Colgan Air d/b/a US Airways Express applicable to Portland International Jetport (Colgan Air d/b/a US Airways Express Flight 5930) in effect on September 11, 2001.

#### **REQUEST NO. 2:**

Produce all of your Federal Aviation Administration (“FAA”) or Transportation Security Administration (“TSA”) approved Security Programs, including all amendments and modifications in force after September 11, 2001.

#### **REQUEST NO. 3:**

Produce the passenger lists or manifests for each of the hijacked flights, including all changes, amendments and modifications made thereto within the fourteen days preceding and including September 11, 2001.

#### **REQUEST NO. 4:**

Produce all documentation reflecting your policies, procedures, guidelines and/or protocols as they existed on September 11, 2001 for matching passenger lists and/or manifests with government “watch lists”, including watch lists issued by the Department of Justice, Federal Bureau of Investigation and/or Immigration and Naturalization Service.

**REQUEST NO. 5:**

Produce a list of all individuals (and their employer) who provided passenger screening services for each of the hijacked aircraft and for Colgan Air d/b/a US Airways Express Flight 5930 that departed Portland International Jetport on September 11, 2001, including, but not limited to, each sterile area, check point, hold area and/or gate area within the respective airports where each of the aforementioned aircraft departed.

**REQUEST NO. 6:**

Provide all documentation reflecting the background checks for each individual who provided passenger and baggage screening services in any manner whatsoever with respect to each of the hijacked aircraft and for Colgan Air d/b/a US Airways Express Flight 5930 that departed Portland International Jetport on September 11, 2001.

**REQUEST NO. 7:**

Provide all documentation generated during the hiring process for each individual who provided passenger screening services for each of the hijacked aircraft and for

Colgan Air d/b/a US Airways Express Flight 5930 that departed Portland International Jetport on September 11, 2001, including all employment applications completed by said individuals.

**REQUEST NO. 8:**

Produce all documents showing compliance with the employment history verification and criminal history records checks pursuant to 14 C.F.R. § 107.31 for all persons having unescorted access to any security identification display area ("SIDA") at Boston Logan International Airport, Portland International Jetport, Washington Dulles International Airport, and Newark International Airport between September 11, 1999 through and including September 11, 2001.

**REQUEST NO. 9:**

Produce all documentation utilized as of September 11, 2001 to train individuals involved in the passenger and baggage screening process, including initial and recurrent training, including, but not limited to, all written curricula, guidelines, study aids as well as all audio and visual presentations.

**REQUEST NO. 10:**

Produce all documents pertaining to the Supervisor Security Training Program, including, without limitation, all written curricula, videotapes, audiotapes, guidelines, and study aids in effect on September 11, 2001.

**REQUEST NO. 11:**

Provide the complete personnel file for each individual who provided passenger screening services with respect to each of the hijacked aircraft and with respect to Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001, including, but not limited to, all screener training records, including screener tests and evaluations.

**REQUEST NO. 12:**

Produce all documents showing compliance with the employment standards pursuant to 14 C.F.R. § 108.31 for all of your security checkpoint screeners employed at Boston Logan International Airport, Portland International Jetport, Washington Dulles International Airport, and Newark International Airport between September 11, 1999 through September 11, 2001.

**REQUEST NO. 13:**

Produce all documents showing compliance with the employment history background check pursuant to 14 C.F.R. § 108.33 for all of your security checkpoint screeners employed at Boston Logan International Airport, Portland International Jetport, Washington Dulles International Airport, and Newark International Airport between September 11, 1999 through September 11, 2001.

**REQUEST NO. 14:**

Provide a list of all test items utilized as of September 11, 2001 during training simulations for pre-boarding screeners including, explosive devices, firearms (real or fake), and/or all dangerous and deadly weapons.

**REQUEST NO. 15:**

Provide all screener operator logs for each of the areas that provided pre-boarding screening for each of the hijacked aircraft and for Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001.

**REQUEST NO. 16:**

Produce all documents that established the policies, procedures, guidelines and/or protocols for checkpoint security as they existed on September 11, 2001.

**REQUEST NO. 17:**

Produce all documents pertaining, regarding, relating, evidencing and/or referring to any violations, enforcement actions, warnings, fines and/or admonitions to you from the FAA or TSA in the preceding 10 years with respect to 14 C.F.R. Part 107 or 108.

**REQUEST NO. 18:**

Produce all documents received from the FAA and/or any governmental agency concerning terrorist threats, including, but not limited to the use of civilian aircraft as

weapons of mass destruction, as well as security directives, briefings, alerts and/or information circulars regarding terrorism and/or threats of terrorist activities for the ten year period preceding September 11, 2001.

**REQUEST NO. 19:**

Produce all Security Directives issued to you by the FAA and/or any governmental agency pursuant to 14 C.F.R. § 108.18 for the five year period preceding September 11, 2001.

**REQUEST NO. 20:**

Produce all Information Circulars issued to you by the FAA and/or any governmental agency pursuant to 14 C.F.R. § 108.18 for the five year period preceding September 11, 2001.

**REQUEST NO. 21:**

Produce all documents reflecting, relating, pertaining, and/or regarding your acknowledgment, implementation and distribution of all Security Directives and Information Circulars issued to you by the FAA and/or any governmental agency for the five year period preceding September 11, 2001 pursuant to 14 C.F.R. § 108.18(b)(1), (2) and (3) and any alternative compliance measures taken pursuant to 14 C.F.R. § 108.18(c).

**REQUEST NO. 22:**

Identify and produce all documents reflecting, relating, pertaining and/or regarding the manner in which prior to September 11, 2001 you communicated in any manner whatsoever with the FAA and/or any governmental agency concerning terrorist activities and/or threats of terrorism against civilian aviation.

**REQUEST NO. 23:**

Provide all documentation exchanged by and between the FAA and/or any governmental agency and you of any communications reflecting, relating, pertaining and/or regarding terrorist activities and/or threats of terrorism against civilian aviation for the ten year period prior to September 11, 2001, including all security directives, briefings, alerts and/or information circulars regarding same.

**REQUEST NO. 24:**

Produce all documents reflecting, relating, pertaining and/or regarding the aircraft security inspection of each of the hijacked aircraft on September 11, 2001 pursuant to 49 C.F.R. § 108.13(d).

**REQUEST NO. 25:**

Produce all documents reflecting, relating, pertaining and/or regarding the aircraft security inspections of the subject aircraft conducted by you between September 11, 1999 through September 11, 2001, pursuant to 49 C.F.R. § 108.13(d).

**REQUEST NO. 26:**

Produce all documents reflecting, relating, pertaining and/or regarding the aircraft security inspections of the subject aircraft at Boston Logan International Airport, Portland International Jetport, Washington Dulles International Airport, and Newark International Airport between September 11, 1999 through September 11, 2001, pursuant to 14 C.F.R. § 108.13(d).

**REQUEST NO. 27:**

Produce any and all documents in existence as of September 11, 2001 delineating and/or defining dangerous and deadly weapons maintained by you as well as any documentation containing a definition of dangerous and deadly weapons as set forth in the Federal Aviation Regulations ("FARs").

**REQUEST NO. 28:**

Produce all documents in existence as of September 11, 2001 reflecting, relating, pertaining and/or regarding any guidelines, waivers, or the like issued by the FAA and/or any governmental agency to airport operators, air carriers, passenger security screening companies, law enforcement personnel, and/or others involved in any passenger screening with respect to the determination of what should be considered a dangerous or deadly weapon or object in the possession of a passenger.

**REQUEST NO. 29:**

Provide all documentation reflecting, relating, pertaining and/or regarding pre-boarding screening procedures and guidelines applicable to the pre-boarding activities for each of the hijacked aircraft and for Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001.

**REQUEST NO. 30:**

Provide all documentation reflecting policies, procedures, guidelines and/or protocols as they existed on September 11, 2001 to be followed when a passenger entering a sterile area causes the metal detector alarm to activate in each airport where the hijacked aircraft departed as well as for Portland International Jetport.

**REQUEST NO. 31:**

Provide all documentation reflecting policies, procedures, guidelines and/or protocols as they existed on September 11, 2001 to be followed when a weapon of any nature, and/or an item that could potentially be used as a weapon, is discovered in the possession of an individual as a result of any pre-boarding screening, including, but not limited to, through the use of a metal detector in each airport where the hijacked aircraft departed and for Portland International Jetport.

**REQUEST NO. 32:**

Provide all documentation as it existed on September 11, 2001 reflecting the duties, responsibilities and/or obligations of law enforcement officers assigned to the respective pre-screening areas in each of the airports where the hijacked aircraft departed and for the screening areas applicable to Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001.

**REQUEST NO. 33:**

Provide all documentation as it existed on September 11, 2001 reflecting the screening process for carry on items in each of the airports where the hijacked aircraft departed as well as for Portland International Jetport.

**REQUEST NO. 34:**

Provide all documentation reflecting, relating, pertaining and/or regarding policies, procedures, guidelines and/or protocols as they existed on September 11, 2001 that pre-boarding screeners were to follow related to the discovery of an item during the pre-boarding process that is inimical or adverse to flight safety for each of the airports where the hijacked aircraft departed as well as for Portland International Jetport.

**REQUEST NO. 35:**

Provide all documentation in existence as of September 11, 2001 that identified items that were considered inimical and/or adverse to flight safety.

**REQUEST NO. 36:**

Provide all documentation in existence as of September 11, 2001 reflecting the duties, responsibilities and/or obligations of the screener-in-charge with respect to each of the screening areas in the airports where the hijacked aircraft departed as well as for Portland International Jetport.

**REQUEST NO. 37:**

Provide all documentation identifying the screener-in-charge for each area that provided pre-boarding screening services for each of the hijacked aircraft and for Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001.

**REQUEST NO. 38:**

Provide all documentation in existence as of September 11, 2001 reflecting the duties, responsibilities and/or obligations of the Checkpoint Security Supervisor with respect to each of the screening areas in the airports where the hijacked aircraft departed and the applicable screening area for Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001.

**REQUEST NO. 39:**

Provide all documentation identifying the Checkpoint Security Supervisor with respect to each area that provided pre-boarding screening services for each of the hijacked aircraft and for Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001.

**REQUEST NO. 40:**

Provide all documentation in existence as of September 11, 2001 reflecting the duties, responsibilities and/or obligations of the Ground Security Coordinator with respect to each of the screening areas in the airports where the hijacked aircraft departed as well as for Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001.

**REQUEST NO. 41:**

Produce all documents reflecting, relating, pertaining and/or regarding the daily reviews conducted by your Ground Security Coordinator at Boston Logan International

Airport, Portland International Jetport, Washington Dulles International Airport, and Newark International Airport between September 11, 1999 through September 11, 2001 pursuant to 14 C.F.R. § 108.29(a)(2).

**REQUEST NO. 42:**

Provide all documentation identifying the Ground Security Coordinator for each area that provided pre-boarding screening services for each of the hijacked aircraft and for Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001.

**REQUEST NO. 43:**

Produce all documents reflecting, relating, pertaining and/or regarding the security training given by you at any time to your Ground Security Coordinator at Boston Logan International Airport, Portland International Jetport, Washington Dulles International Airport, and Newark International Airport as of September 11, 2001 pursuant to 14 C.F.R. § 108.23(a).

**REQUEST NO. 44:**

Produce the complete personnel files, including, without limitation, training records and background checks, of each security check point screener, including supervisory and management personnel, employed by you acting in that capacity at Portland International Jetport, Boston Logan International Airport, Washington Dulles International Airport and Newark International Airport at anytime in the 5 year period prior to and including September 11, 2001.

**REQUEST NO. 45:**

Produce all documents reflecting, relating, pertaining and/or regarding the security training given by you at anytime to your Inflight Security Coordinator as of September 11, 2001 at Boston Logan International Airport, Portland International Jetport, Washington Dulles International Airport, and Newark International Airport pursuant to 14 C.F.R. § 108.23(a) for the subject flights.

**REQUEST NO. 46:**

Produce all documents reflecting, relating, pertaining and/or regarding any Special Emphasis Assessments, Red Team Inspections, Security Sweeps, and/or any other inspections or assessments of security equipment, personnel, and/or procedures employed by you and your security screening contractor, between September 11, 1999 through and including September 11, 2001, specifically including documents identifying all employees, participants and/or experts involved in any of the aforementioned inspections.

**REQUEST NO. 47:**

Produce all documents reflecting, relating, pertaining and/or regarding any meetings and other communications by and between the Airline Management Group at Boston Logan International Airport, Portland International Jetport, Washington Dulles International Airport, and Newark International Airport between September 11, 1999 through September 11, 2001, specifically including documents identifying all employees, participants and/or experts involved in any of the aforementioned meetings.

**REQUEST NO. 48:**

Produce all documents reflecting, relating, pertaining and/or regarding any meetings or other communications by and between the Security Training Sub-Group of the Airline Management Group at Boston Logan International Airport, Portland International Jetport, Washington Dulles International Airport, and Newark International Airport between September 11, 1999 through September 11, 2001, specifically including documents identifying all employees, participants and/or experts involved in any of the aforementioned meetings.

**REQUEST NO. 49:**

Produce all documents, including, but not limited to, memoranda, correspondence and/or minutes, from any meeting wherein airport security at Boston Logan International Airport, Portland International Jetport, Washington Dulles International Airport, and Newark International Airport was discussed for the ten year period preceding September 11, 2001.

**REQUEST NO. 50:**

Produce all documents reflecting, relating, pertaining and/or regarding any correspondence or other communications by and between you and the airport operator (as defined under the FAR's) relating to any joint security testing at Boston Logan International Airport, Portland International Jetport, Washington Dulles International Airport, and Newark International Airport between September 11, 1999 through September 11, 2001.

**REQUEST NO. 51:**

Produce all documents reflecting, relating, pertaining and/or regarding the Logan Airport Security Enhancement and Review (LASER) program in effect on September 11, 2001.

**REQUEST NO. 52:**

Produce all documents reflecting, relating, pertaining and/or regarding any meetings or other communications by and between the security advisory committee of International Air Transport Association (“IATA”) and you with respect to any warnings, advisories, alerts, guidelines, and the like issued by said committee within the ten year period preceding September 11, 2001.

**REQUEST NO. 53:**

Produce all documents, including, but not limited to, records of each law enforcement action taken pursuant to 14 C.F.R. § 107.23 between September 11, 1999 through September 11, 2001.

**REQUEST NO. 54:**

Provide the complete Checkpoint Operations Guide as it existed on September 11, 2001.

**REQUEST NO. 55:**

Provide complete copies of any and all domestic screening audits conducted by you of any pre-boarding screeners and or screening companies providing pre-boarding screening services for the five year period preceding September 11, 2001, specifically including domestic screening audits for the pre-boarding screeners that provided pre-boarding screening services for each of the hijacked aircraft and for Colgan Air d/b/a US

Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001.

**REQUEST NO. 56:**

Provide all documentation detailing the manner in which pre-boarding screening companies were hired and/or selected by you for the ten year period preceding September 11, 2001 specifically including with respect to those companies that provided pre-boarding screening services for each of the hijacked aircraft and for Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001.

**REQUEST NO. 57:**

Provide all documentation, including, but not limited to, memorandum, correspondence, contractual agreements and/or invoices, including all attachments, addenda, appendices, riders and/or exhibits, exchanged by and between you and the respective pre-boarding screening company (checkpoint and baggage), its agents, servants and/or employees, that provided pre-boarding screening services in any manner whatsoever for each of the hijacked aircraft and for Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001, for the five year period preceding September 11, 2001.

**REQUEST NO. 58:**

Produce the contract, in its entirety, including all attachments, addenda, appendices, riders, exhibits, etc., between you and your security contractor providing checkpoint and baggage screening services at Boston Logan International Airport, Portland International Jetport, Washington Dulles International Airport, and Newark International Airport in effect on September 11, 2001.

**REQUEST NO. 59:**

Provide all documentation setting forth the time each of the hijacked aircraft began its respective takeoff roll.

**REQUEST NO. 60:**

Produce all cost sharing agreements between you and any other entity regarding the issue of airport security at Boston Logan International Airport, Portland International Jetport, Washington Dulles International Airport, and Newark International Airport for the ten year period preceding September 11, 2001.

**REQUEST NO. 61:**

Provide all documentation setting forth your policies, procedures, guidelines and/or protocols with respect to a flight crew's response to a hijack situation as they existed on September 11, 2001.

**REQUEST NO. 62:**

Provide all documentation setting forth your policies, procedures, guidelines and/or protocols reflecting, relating, pertaining and/or regarding corporate management's response to a hijack situation as they existed on September 11, 2001.

**REQUEST NO. 63:**

Provide all documentation detailing the names of all individuals and/or governmental agencies that are required to receive notice once you are aware of a hijack situation as said procedures existed on September 11, 2001.

**REQUEST NO. 64:**

Provide all documentation setting forth any notifications given as a result of the hijackings of September 11, 2001 in accordance with your company's policy and procedure.

**REQUEST NO. 65:**

Provide all documentation regarding cockpit door design for each of the hijacked aircraft.

**REQUEST NO. 66:**

Provide all documentation regarding any alternative feasible design considered for the cockpit door on each of the hijacked aircraft, including, all documents reflecting

damage tolerances of the cockpit door as well as considerations given to strengthening the cockpit door against unwanted intrusion into the cockpit.

**REQUEST NO. 67:**

Produce all documents, including, without limitation, any tapes, records, notes, memoranda, reports, summaries or other documents of any kind reflecting any communications between the hijacked aircraft and air traffic control.

**REQUEST NO. 68:**

Produce all documents, including, without limitation, any tapes, records, notes, memoranda, reports, summaries or other documents of any kind pertaining, referring, referencing, evidencing, and/or relating to any communications between your employees on board any of the hijacked aircraft and your employees on the ground on September 11, 2001.

**REQUEST NO. 69:**

Provide all documentation regarding training provided to flight crews as of September 11, 2001 regarding a hijack situation.

**REQUEST NO. 70:**

Provide all documentation regarding training provided to cabin crews as of September 11, 2001 regarding a hijack situation.

**REQUEST NO. 71:**

Provide the Pilot Operating Handbook applicable to each of the four hijacked aircraft.

**REQUEST NO. 72:**

Provide your Air Carrier Operating Certificate.

**REQUEST NO. 73:**

Provide all documentation reflecting any upset and/or unusual attitude training provided to flight crews as of September 11, 2001 with respect to a known hijack situation and a flight crew's attempt to prevent same.

**REQUEST NO. 74:**

Provide all documentation regarding ticketing, boarding passes and seat assignments for all individuals on board each of the hijacked aircraft.

**REQUEST NO. 75:**

Provide a list of all persons on board each of the hijacked aircraft.

**REQUEST NO. 76:**

Produce documentation identifying each person on board an aircraft who participated in the hijacking of United Airlines Flight 175, American Airlines Flight 11, United Airlines Flight 93, and American Airlines Flight 77 on September 11, 2001.

**REQUEST NO. 77:**

Provide all training records for the flight crew of each of the hijacked aircraft, including specifically any documentation reflecting any upset and/or unusual attitude training received as a result of a known hijack situation and the flight crew's attempt to prevent same.

**REQUEST NO. 78:**

Provide the Aircraft Flight Manual for each of the hijacked aircraft.

**REQUEST NO. 79:**

Provide a partial and/or complete transcript of the cockpit voice recorder for each of the hijacked aircraft as well as the original or duplicate of the cockpit voice recorder tape.

**REQUEST NO. 80:**

Provide all documentation setting forth any communications between any crew member (flight crew and/or cabin crew) aboard each of the hijacked aircraft with air traffic control and/or anyone else.

**REQUEST NO. 81:**

Provide all documentation reflecting radar returns and/or depictions of radar returns for each of the hijacked aircraft.

**REQUEST NO. 82:**

Produce all documents containing any partial or complete printout and/or readout of the flight data recorder or digital flight data recorder for each of the hijacked aircraft in both its corrected and uncorrected forms.

**REQUEST NO. 83:**

All documents containing photographs, videotapes or other visual depictions of each of the hijacked aircraft.

**REQUEST NO. 84:**

Provide all documentation reflecting, relating, pertaining and/or regarding the investigation into each of the hijacked aircraft.

**REQUEST NO. 85:**

Provide all formal and/or informal reports, or drafts of same, regarding each hijacked aircraft prepared by you and/or any governmental agency involved in the investigation into each of the hijacked aircraft, including, but not limited to, the National Transportation Safety Board (“NTSB”), the FAA and/or the Federal Bureau of Investigation (“FBI”).

**REQUEST NO. 86:**

Provide all documentation regarding any investigation into a hijack event, whether such event occurred on American, United and/or any other domestic or foreign air carrier for the ten year period preceding September 11, 2001.

**REQUEST NO. 87:**

Produce all documentation reflecting, relating, pertaining and/or regarding the date and location of every hijacking incident or attempted hijacking incident involving you or your aircraft since 1970.

**REQUEST NO. 88:**

Produce all documentation reflecting, relating, pertaining and/or regarding each and every incident of unwanted cockpit intrusion involving you or your aircraft and/or any other domestic and/or foreign air carrier since 1970.

**REQUEST NO. 89:**

Produce all documentation reflecting any communications from and/or to you and/or your agents, servants, employees and/or representatives, and the NTSB, the FAA, the FBI and/or any other governmental agency regarding the hijacked aircraft.

**REQUEST NO. 90:**

Produce all documentation regarding any communication between you and the Airline Pilots Association (“ALPA”) and/or the Allied Pilots Association (“APA”) concerning any of the hijacked aircraft and investigation into same.

**REQUEST NO. 91:**

Produce all communications to and between any person, firm, or governmental agency, including, but not limited to your agents, servants, employees and/or representatives, other than as set forth herein regarding the investigation into each of the four hijacked aircraft.

**REQUEST NO. 92:**

Produce all documents, as well as a list of same, provided to any governmental agency as a result of the investigation into each of the four hijacked aircraft.

**REQUEST NO. 93:**

Produce all documents identifying each of your employees having access to any "Security Sensitive Information" as defined by 14 C.F.R. Part 191 or information covered by 14 C.F.R. Part 193 between September 11, 1999 through September 11, 2001.

**REQUEST NO. 94:**

Produce all documents containing any insurance agreement which provides coverage for liability claims as a result of the crash of each of the four hijacked aircraft, including claims brought by passengers and/or victims injured or killed on the ground.

**REQUEST NO. 95:**

Produce all documents showing policy limits for claims resulting from the crash of each of the four hijacked aircraft.

**REQUEST NO. 96:**

Produce all documents pertaining to your insurance coverage and any claims received and/or paid by such insurance arising from the hijacking of any aircraft owned and/or operated by you, and produce all documentation identifying any entity with whom you have contracted in obtaining insurance coverage related to aviation hijacking in effect on September 11, 2001.

**REQUEST NO. 97:**

Produce all documents containing any agreement signed by you and/or your agents, servants, employees and/or representatives as a result of the investigation into each of the four hijacked aircraft.

**REQUEST NO. 98:**

Produce all documents identifying anyone, including, but not limited to, your agents, servants, employees and/or representatives who participated in the investigation into each of the four hijacked aircraft as well as with respect to any investigation into Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001.

**REQUEST NO. 99:**

Produce all documents containing or recording communications of any nature between any of your insurers and/or reinsurers and any governmental agency involved in the investigation into the crash of each of the four hijacked aircraft as well as regarding the investigation into Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001.

**REQUEST NO. 100:**

Produce all documentation contained within your complete file regarding the investigation into each of the four hijacked aircraft as well as for Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001.

**REQUEST NO. 101:**

Produce all documents reflecting, relating, pertaining and/or regarding any and all interviews conducted by you of any individual involved in pre-boarding screening of the passengers on board each of the four hijacked aircraft, as well as any individual involved in pre-boarding screening of the passengers on board Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001.

**REQUEST NO. 102:**

Produce all documents reflecting, relating, pertaining and/or regarding any and all interviews conducted by any governmental agency of any individual involved in pre-boarding screening of the passengers on board each of the four hijacked aircraft and Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001.

**REQUEST NO. 103:**

Produce all documents reflecting, relating, pertaining and/or regarding any and all witness statements taken by or given to you of any individual involved in pre-boarding screening of the passengers on board each of the four hijacked aircraft and Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001.

**REQUEST NO. 104:**

Produce all documents reflecting, relating, pertaining and/or regarding any and all witness statements taken by or given to any governmental agency of any individual involved in pre-boarding screening of the passengers on board each of the four hijacked aircraft and Colgan Air d/b/a US Airways Express Flight 5930 that departed from Portland International Jetport on September 11, 2001.

**REQUEST NO. 105:**

Produce all documents reflecting, relating, pertaining and/or regarding any notifications or other communications from the Security and Exchange Commission to you regarding stock market activity of your stock, and the value of same, for the time period of January 1, 2001 up through and including December 31, 2001.

**REQUEST NO. 106:**

Produce any and all design, feasibility, cost, production, manufacturing or related studies or reports conducted or requested by Boeing concerning the cockpit doors and accompanying cockpit locks in the subject aircraft.

**REQUEST NO. 107:**

Please produce any and all documents that identify the airline carriers and/or others responsible for passenger and/or baggage screening areas applicable to the airport areas from where the hijacked aircraft departed.

**TO: ALL BUILDING DEFENDANTS**

**INTERROGATORY NO. 1.:**

State the name and address of every person or other entity (stating the names of specific relevant individuals within such entity) known to defendants, their attorneys, or other representatives, having or claiming to have knowledge of any fact or document relating to the subject crashes and/or subject collapses and/or subject fires and/or the occurrences alleged in plaintiffs' complaints and state with specificity the substance of such knowledge, including but not limited to any person who observed or was a witness by sight, sound or electronic device to all or any part of the subject crashes, fires or collapses.

**INTERROGATORY NO. 2.:**

List the names and address of all agents, employees, investigators, engineers, experts, representatives or others who on defendants' behalf or request have investigated the subject crashes and/or subject collapses and/or subject fires and/or the occurrences alleged in plaintiffs' complaints.

**INTERROGATORY NO. 3.:**

Were any statements, written, video, audio or otherwise, obtained from anyone who was interviewed or questioned by the defendants or on defendants' behalf in connection with the subject crashes and/or subject collapses and/or subject fires and/or the occurrences alleged in plaintiffs' complaints, and if so, please verify each such statement if it was in writing, or on audio or videotape, and, if not in writing or on tape, then provide full details of each such statement.

**INTERROGATORY NO. 4.:**

Identify by name, address, telephone number and employer each and every person who participated in any way whatsoever in the research for or compilation of these answers to interrogatories filed herewith.

**INTERROGATORY NO. 5.:**

Identify by name, address and telephone number each and every facility manager or other person who had any management or supervisory responsibilities for security; operations control center; fire safety; fire protection; vertical transportation systems; maintenance, renovation or structural modifications; and, emergency access and evacuation systems for the subject buildings.

**INTERROGATORY NO. 6.:**

Identify by name, address and telephone number each and every person who was employed or designated as:

- a. engineering supervisor or manager;
- b. supervisor of the specifications;
- c. supervisor of the planning and construction;
- d. supervisor of the inspection and safety;
- e. supervisor of the capital projects;
- f. supervising safety engineer;
- g. building superintendent;
- h. building inspector;
- i. security chief, supervisor or manager;
- j. maintenance supervisor or manager;
- k. fire marshal;
- l. fire safety director;
- m. assistant or deputy fire director;
- n. vertical transportation chief;
- o. operations supervisor; and
- p. each tenant and/or floor warden(s)

for the subject buildings on September 11, 2001 and at all times since the start of construction of the subject buildings.

**INTERROGATORY NO. 7.:**

Identify all project and/or construction managers, architects and consulting architects and general contractor(s) for the subject buildings design and construction; and, all supervising engineers, fire protection engineers, structural engineers, mechanical engineers, electrical engineers who designed, constructed, maintained, repaired, renovated, inspected, tested or otherwise serviced the subject buildings; and, the Director of the World Trade Center for the Port Authority, Assistant Director for the World Trade Center for the Port Authority, Executive Director for the Port Authority, Fire Safety Director for the Port Authority and Real Estate Manager for the Port Authority on September 11, 2001 and at all times since the start of construction of the subject buildings.

**INTERROGATORY NO. 8.:**

Identify by name, address and telephone number of all employees, including managers and supervisors, who inspected, maintained, or repaired the subject buildings for the 10 years prior to and on September 11, 2001.

**INTERROGATORY NO. 9.:**

Identify all documents (including but not limited to daily logs, discrepancy reports, progress reports or other similar records) which mention, discuss, refer or relate to the condition, maintenance, repair, renovation, upgrade, inspection or servicing of the subject buildings' structural systems (including but not limited to the external and internal columns, core area, floor deck assemblies, tower beams, girders, bar joists, trusses, truss seats, spandrels, bolt, weld, plate or truss connections, fasteners, and

dampers), fireproofing of structural components, fire protection systems (including but not limited to sprinkler systems, standpipes, fire department water connections), fire alarm system, water supply system available for fire suppression, smoke management ventilation system, primary, emergency and back-up power systems, emergency notifications (announcement) system, emergency communications systems, fire and emergency control centers, elevator systems, emergency egress and evacuation systems (including stairwells), for the 10 years prior to and on September 11, 2001.

**INTERROGATORY NO. 10.:**

Identify by name, address and telephone number the person or persons who, on behalf Defendants, have provided information to, corresponded with, or had any other contact with any representative of the National Institute of Standards and Technology (NIST), Federal Emergency Management Agency (FEMA), American Society of Civil Engineers (ASCE, including the Structural Engineering Institute), New York City Department of Design and Construction (DDC), New York City Office of Emergency Management (OEM), Structural Engineers Association of New York (SEAoNY); New York Police Department (NYPD), Fire Department of New York (FDNY) in connection with the investigation of the subject crashes and/or subject collapses and/or subject fires and/or subject buildings' design, construction, structural systems, fireproofing of structural components, fire protection systems (including but not limited to sprinkler systems, standpipes, fire department water connections), fire alarm system, water supply system available for fire suppression, smoke management ventilation system, primary, emergency and back-up power systems, emergency notifications

(announcement) system, emergency communications systems, fire and emergency control centers, elevator systems, emergency egress and evacuation systems (including stairwells), and/or the occurrences alleged in plaintiffs' complaints on September 11, 2001, and state the nature and date of the contact.

**INTERROGATORY NO. 11.:**

Identify by name, address and telephone number the person or persons responsible for:

- (a) building code requirements or any such other provisions which governed design, construction, maintenance and repair of the subject buildings' structural systems, fireproofing of structural components, fire protection systems (including but not limited to sprinkler systems, standpipes, fire department water connections), fire alarm system, water supply system available for fire suppression, smoke management ventilation system, primary, emergency and back-up power systems, emergency notifications (announcement) system, emergency communications systems, fire and emergency control centers, elevator systems, emergency egress and evacuation systems (including stairwells); and
- (b) installation, servicing, maintenance, repairs and inspection of the subject buildings' fireproofing; and
- (c) any modifications, revisions or changes to the design or construction of subject buildings' structural systems, fireproofing of structural components, fire protection systems (including but not limited to sprinkler

systems, standpipes, fire department water connections), fire alarm system, water supply system available for fire suppression, smoke management ventilation system, primary, emergency and back-up power systems, emergency notifications (announcement) system, emergency communications systems, fire and emergency control centers , elevator systems, emergency egress and evacuation systems (including stairwells) following the February 1993 World Trade Center bombing.

**INTERROGATORY NO. 12.:**

Identify by name, address and telephone number each and every employee, manager, supervisor or other person who tested, inspected, evaluated the elevator systems (including emergency controls), fire alarm system, emergency notifications (announcement) system, emergency communications systems and fire and emergency control centers at the subject buildings at any time from to September 11, 2000 to September 11, 2001.

**INTERROGATORY NO. 13.:**

Identify by name, address and telephone number all persons who provided fire safety, emergency management and emergency egress and evacuation training for the subject buildings to safety directors, deputy fire safety directors, tenant and floor fire wardens, personnel assigned to the World Trade Center Fire Brigade, or, any other tenant, occupant or employee of the subject buildings.

**INTERROGATORY NO. 14.:**

Identify by name, address and telephone number each and every person who developed and implemented the procedures, guidelines and instructions governing fire drills for the subject buildings.

**INTERROGATORY NO. 15.:**

Identify and/or describe the location of all emergency exits, fire/emergency control and communications (command) centers, radio repeaters and/or radiax cable and antenna, stairwells, transfer corridors, elevators, automatic sprinklers, fire department external water connections, standpipes, hose lines and air-pressurized water extinguishers, the water supply system available for fire suppression (including location of water mains, pumps, storage tanks), smoke management ventilation system, primary, emergency and back-up power systems and emergency or evacuation lighting systems for the subject buildings on September 11, 2001.

**INTERROGATORY NO. 16.:**

Identify by name, address and telephone number every contractor and/or subcontractor who provided services relating to fire safety, security, structural systems, fireproofing of structural components, fire protection systems (including but not limited to sprinkler systems, standpipes, fire department water connections), fire alarm systems, water supply system available for fire suppression, smoke management ventilation system, primary, emergency and back-up power systems, emergency notifications (announcement) system, emergency communications systems, fire and emergency control centers, elevator systems, emergency egress and evacuation systems (including stairwells), and radio repeaters for the subject buildings.

**INTERROGATORY NO. 17.:**

Describe in detail the business relationship and identify all contracts between the Port Authority and Silverstein Properties which relate or refer to the subject buildings.

**INTERROGATORY NO. 18.:**

Identify all documents, including but not limited to, all pleadings, discovery production, responses to document requests and interrogatories, expert reports, affidavits, depositions and exhibits produced or submitted in connection with the litigation styled “The Port Authority of New York and New Jersey, et al. v. Allied Corporation, et al., 91 Civ. No. 0310 (CLB)” filed in the United States District Court Southern District of New York.

**INTERROGATORY NO. 19.:**

Identify all documents, including but not limited to all pleadings, discovery productions, responses to document requests and interrogatories, expert reports, affidavits, depositions and exhibits produced or submitted in connection with the litigation styled "SR International Co. v. WTC Properties, et al., Civ. No. 01-CV-9291" filed in the United States District Court Southern District of New York.

**INTERROGATORY NO. 20.:**

Identify all members of the Port Authority Risk Management Group for the ten years prior to and on September 11, 2001.

**INTERROGATORY NO. 21.:**

Describe the fire protection systems and construction features for or otherwise associated with each of the stairwells and elevator shafts in the subject buildings and provide any applicable ratings (i.e., load and/or fire protection ratings) determined for said systems or features.

**INTERROGATORY NO. 22.:**

State the exact time when the order/announcement was issued to evacuate World Trade Center Tower 1 and identify the name, address and telephone number of the person or persons who gave that order/announcement.

**INTERROGATORY NO. 23.:**

State the exact time when the order/announcement was issued indicating that occupants should remain in Tower 2 and/or that the building was secure and/or that occupants should return to their offices and/or words to that effect and identify the name, address and telephone number of the person or persons who gave that order/announcement.

**INTERROGATORY NO. 24.:**

State the exact time when the order/announcement was issued to evacuate World Trade Center Tower 2 and identify the name, address and telephone number of the person or persons who gave that order/announcement.

**INTERROGATORY NO. 25.:**

Identify all victims known to defendants to have listened to the message (referenced in Interrogatory No. 23) to return to their respective floors/offices who did not survive the subject crash or collapse of World Trade Center Tower 2.

**INTERROGATORY NO. 26.:**

Identify all victims known to defendants who attempted to travel to the top (roof) of World Trade Center Tower 1 or 2 after the subject crashes.

**INTERROGATORY NO. 27.:**

State whether the exit doors at the top (roof) of the subject buildings were locked on September 11, 2001.

**INTERROGATORY NO. 28.:**

Identify all test methods used to determine whether spray-on fire proofing materials were properly applied to the structural components of the subject buildings; state when those tests were performed; and, identify all documents which record the test results.

**INTERROGATORY NO. 29.:**

Identify all grades, types and variants of metal used in the structural components of the subject buildings, including but not limited to, the external and internal columns, floor deck assemblies, tower beams, bar joints, trusses, truss seats, welds, spandrels, connectors (i.e., bolted column end plate connections, bolted spandrel connections, truss connections), fasteners and girders.

**INTERROGATORY NO. 30.:**

Identify all individuals and/or entities, including their name, address and telephone number, who applied or submitted a bid for the 99-year lease for the subject buildings.

**INTERROGATORY NO. 31.:**

State whether the defendants have been investigated by any Federal, State or New York City authorities at any time regarding the World Trade Center complex. If so, state the nature of the investigation.

**INTERROGATORY NO. 32.**

State whether the subject buildings complied with or satisfied the applicable provisions of the New York City Building and Fire Code in effect at the time the subject buildings were designed and constructed. If not, identify those provisions not complied with or satisfied and state why code was not met.

**INTERROGATORY NO. 33.:**

Identify which elevators in the subject buildings were operational and running (a) immediately prior to the subject crashes and (b) following the subject crashes.

**INTERROGATORY NO. 34.:**

Describe in detail the duties, responsibilities, obligations and services provided by the following companies with respect to the design, construction, maintenance, inspection, testing, repair, renovation, upgrade and operation of the subject buildings:

Emery Roth and Partners LLC, d/b/a Emery Roth & Sons;

Leslie E. Robertson Associates;

Minoru Yamasaki Associates, Inc.;

Port Authority of New York and New Jersey;

Skilling Ward Magnusson Barkshire Inc.;

Silverstein Properties, Inc.;

Tishman Realty & Construction Co., Inc.;

Emery Roth & Sons;

Kroll Inc.;

Summit Security Services Inc.;

OCS Security Inc.;

ABM Engineering Co.;

ACE Elevator Co.;

United States Mineral Products Company, Inc.;

W.R. Grace Co.;

**INTERROGATORY NO. 35.:**

State the specific structural loading criteria and other applicable provisions for the structural fire protection of the subject buildings structural system.

**INTERROGATORY NO. 36.:**

Identify all structural modifications made to the subject buildings following the February 1993 World Trade Center bombing.

**INTERROGATORY NO. 37.**

Identify all individuals in the World Trade Center Fire Brigade.

**INTERROGATORY NO. 38.:**

Identify all stairwells above the impact points which were useable for access or egress immediately following the subject crashes.

**INTERROGATORY NO. 39.:**

Identify all persons involved in the design and construction of the structural system, fireproofing of structural components and installation and safety evaluations for placement of the diesel fuel storage tanks, pumps, pipes, generators and related systems in 7 World Trade Center.

**DOCUMENT REQUESTS**

**REQUEST NO 40:**

Produce all documents identified in response to plaintiffs' interrogatories.

**REQUEST NO 41:**

Produce the most recent version of your corporate directory or other similar document that provides information such as the identity of employees of defendant(s), together with their job titles, business locations or addresses, and telephone numbers (whether business or residence).

**REQUEST NO 42:**

Produce all liability insurance policies in existence at the time of the subject crashes, fires and/or collapses which may provide coverage for the claims in this lawsuit, and any reservation of rights or agreement regarding coverage.

**REQUEST NO 43:**

Produce all documents relating to any investigation, analysis, technical evaluations, simulations, computer modeling, assessments, factual findings, metallurgical examinations, conclusions or recommendations concerning the subject crashes, fires, collapses and/or subject buildings, including but not limited to any documents received from or directed to the National Institute of Standards and Technology (NIST), Federal Emergency Management Agency (FEMA), American Society of Civil Engineers (ASCE, including the Structural Engineering Institute), New York City Department of Design and Construction (DDC), New York City Office of Emergency Management (OEM), Structural Engineers Association of New York (SEAoNY); New York Police Department (NYPD), Fire Department of New York (FDNY) which mention, discuss, refer or relate to the subject buildings' design, construction, structural systems, fireproofing of structural components, fire protection systems (including but not limited to sprinkler systems, standpipes, fire department water connections), fire alarm system, water supply system available for fire suppression, smoke management ventilation system, primary, emergency and back-up power systems, emergency notifications (announcement) system, emergency communications systems, fire and emergency control centers, elevator systems, emergency egress and evacuation systems (including stairwells).

**REQUEST NO 44:**

Produce all documents provided to or received from the FEMA/ASCE Building Performance Assessment Team (BPAT).

**REQUEST NO 45:**

Produce all timelines, chronologies and event summaries relating to September 11, 2001.

**REQUEST NO 46:**

Produce all documents relating to the lease of the subject buildings by the Port Authority, including but not limited to, all contract and/or lease documents (including the contract with all attachments, appendices, riders and exhibits, etc. relating to the lease of the subject buildings between Port Authority and Silverstein Properties), all other bid documents (including inspection reports, building surveys, appraisals, safety assessments and/or structural, mechanical, electrical or other engineering reports or fire safety surveys done by or provided to all individuals/entities bidding or applying for the lease of the subject buildings).

**REQUEST NO 47:**

Produce the structural survey report performed by Thornton-Thomasetti and/or the Port Authority Engineering-Survey personnel in connection with the bids for a 99-year lease for the subject buildings.

**REQUEST NO 48:**

Produce all documents which mention, discuss, refer or relate to the requirements, procedures, guidelines and instructions for the installation, maintenance, repair, inspection, servicing and operation of the subject buildings' structural systems, fireproofing of structural components, fire protection systems (including but not limited to sprinkler systems, standpipes, fire department water connections), fire alarm system, water supply system available for fire suppression, smoke management ventilation system, primary, emergency and back-up power systems, emergency notifications (announcement) system, emergency communications systems, fire and emergency control centers, elevator systems, emergency egress and evacuation systems (including stairwells).

**REQUEST NO 49:**

Produce all photographs, audiotapes, video images, computer models, charts, graphics and/or simulations of the subject crashes and/or subject fires and/or subject buildings and/or subject collapses or its aftermath, the post collapse clean-up and wreckage removal, or any of the aircraft or building wreckage materials.

**REQUEST NO 50:**

Produce all statements (audio, video or written) made by survivors, witnesses or emergency workers (including but not limited to witness observation summaries, electronic mail (email) messages, phone call summaries or transcripts) concerning the subject crashes, fires, collapses or events of September 11, 2001.

**REQUEST NO 51:**

Produce all recorded communications between building occupants and emergency personnel; all recorded radio transmissions; and, all data recorded by Port Authority operations (including but not limited to the operation control center and fire/emergency control center(s)) on September 11, 2001.

**REQUEST NO 52:**

Produce all documents received from or sent to OSHA concerning design, construction, fireproofing and/or fire protection specifications for the subject building ; building and fire code requirements; and, emergency evacuation and egress plans.

**REQUEST NO 53:**

Produce all documents which mention, discuss refer, or relate to the stairwell requirements (width, number, location, lighting, vertical continuity, etc.) for the subject buildings (including but not limited to any analysis of the stairwell performance during the 1993 evacuation and on September 11, 2001).

**REQUEST NO 54:**

Produce all documents which mention, refer, relate or discuss the pressure resistance of the stairwell construction in the subject buildings (including any impact or load analysis).

**REQUEST NO 55:**

Produce all documents (including but not limited to those sent to or received from NIST and its Building and Fire Research Laboratory) which mention, discuss, refer or relate to the February 1993 World Trade Center bombing and evacuation, including but not limited:

- a. occupant behavior;
- b. fire protection and safety;
- c. delays in egress;
- d. lessons learned;
- e. proposed and adopted changes, modifications, revisions to the subject buildings' evacuation and egress plans;
- f. proposed and adopted changes, modifications, revisions to the subject buildings' design, construction, building materials, stairwells, elevators, emergency evacuation and egress routes;
- g. performance of the built-in fire protection systems (including sprinkler systems and fire alarms), smoke management ventilation system, power systems, emergency lighting systems and water supply systems; and
- h. adequacy of fireproofing materials on subject buildings' structural components.

**REQUEST NO 56:**

Produce all floor plans, elevations, cross sections, diagrams, schematics, blueprints, contract drawings, engineering drawings, architectural drawings, mechanical drawings, structural drawings, “conformed” structural drawings or other drawings, design calculations, data and building, design or engineering specifications, and “as built” specifications for the subject buildings, and any changes, modifications, revisions to the specifications and all correspondence and memorandum related thereto, including but not limited to, (a) the structural system, including but not limited to the external and internal wall columns, connections, spandrels, base plates, core area, trusses, floor deck assemblies, girders, bar joists, beams, dampers and concrete slabs and all other major structural components; (b) elevator shafts and systems and transfer corridors (sky lobbies); (c) fireproofing for all structural components; (d) emergency exits, stairwells, and transfer corridors; (e) automatic sprinklers, fire department external water connections, standpipes, hose lines and air-pressurized water extinguishers, the water supply system available for fire suppression; (f) smoke management ventilation system; (g) primary, emergency and back-up power systems; and, (h) emergency or evacuation lighting systems.

**REQUEST NO 57:**

Produce all specifications, drawing logs, revisions, final drawings and mill reports (or other report which provide tensile strength and other physical properties) for all steel components, including but not limited to the open-web floor trusses provided by LaClede Steel Company of St. Louis; structural steel for the exterior wall provided by

Pacific Car and Foundry Company of Seattle; and, core columns and beam framing components provided by Stanray Pacific Corporation of Los Angeles.

**REQUEST NO 58:**

Produce all documents, including but not limited to specifications, drawings, or revisions and tests or inspection records for the high tensile bolts used to fasten trusses to columns for the subject buildings' structural system.

**REQUEST NO 59:**

Produce all construction documentation, including but not limited to construction logs, change orders (including all memorandum, correspondence, letters and instructions relating to changes to be made during construction), discrepancy reports, test and inspection records for the subject buildings' structural system, elevator shafts and systems and transfer corridors (sky lobbies); fireproofing for all structural components; emergency exits, stairwells, and transfer corridors; automatic sprinklers, fire department external water connections, standpipes, the water supply system available for fire suppression; smoke management ventilation system; primary, emergency and back-up power systems; and, emergency or evacuation lighting systems.

**REQUEST NO 60:**

Produce all documents which establish the building design and construction standards and code for the subject buildings.

**REQUEST NO 61:**

Produce all documents which mention, discuss, refer or relate to the Port Authority's policy that the internal building design and construction standards of the Port Authority meet or exceed the standards of the New York City Building Code.

**REQUEST NO 62:**

Produce all documents which mention, discuss, refer or relate to any analysis, evaluation, assessment or comparison addressing whether the subject buildings met the requirements of applicable building and fire codes, including but not limited to, the applicable New York City Building and Fire Codes (i.e., assessing the code-conformance of the subject buildings' design, construction and fire safety).

**REQUEST NO 63:**

Produce all documents which mention, discuss, refer or relate to development and implementation of an emergency evacuation and egress training program.

**REQUEST NO 64:**

Produce all documents, photographs, video images, reports, analyses, data, materials and/or lists which identify concrete, steel or other structural components or debris from the subject buildings provided to or received from the Structural Engineers Association of New York (SEAoNY).

**REQUEST NO 65:**

Produce all documents which mention, discuss, refer or relate to the specific structural and fire protection features and/or systems for the subject buildings.

**REQUEST NO 66:**

Produce all documents which mention, discuss, refer or relate to:

- a. the steel floor truss system (including its redundancy, robustness and comparison to other structural systems);
- b. the use of impact resistant enclosures around egress paths and stairwells;
- c. resistance of passive fire protection to blasts or impact hazards;
- d. improvements to the location of emergency egress stairways and use of transfer floors;
- e. adherence of fireproofing under impact and fire conditions;
- f. performance of building structural connections under impact loads and during fire loads; and
- g. the smoke management ventilation systems for the subject buildings.

**REQUEST NO 67:**

Produce all documents which mention, discuss, refer or relate to fire safety requirements for the egress and emergency notification (alarm) systems, automatic

sprinkler system, standpipe system, emergency control of elevators, emergency communication systems and fire/emergency control centers.

**REQUEST NO 68:**

Produce the design analysis, technical evaluation, modeling or other reports or studies which considered the structural and load impact and building damage resulting from a jet airliner (Boeing 707) striking the subject building(s) and all documents which mention, discuss, refer or relate to that analysis.

**REQUEST NO 69:**

Produce all documents which mention, discuss, refer or relate to any aircraft intentionally or accidentally hitting the subject building(s).

**REQUEST NO 70:**

Produce all documents which demonstrate that the structural components of the subject buildings met the requirements of the standard test method for fire test and building constructions and materials (ASTME 119 a/k/a standard fire test) or any other applicable fire test.

**REQUEST NO 71:**

Produce all documents which identify and describe the grades, variants and types of metal used in the subject buildings' structural system and their respective thicknesses and yield strengths; all manufacturers' certifications for the materials used

in the subject buildings; and, all test reports which describe the mechanical properties and chemical composition of the steel and other metals used in the subject buildings.

**REQUEST NO 72:**

Produce all documents which mention, discuss, refer or relate to the fire resistance or fireproofing of the subject buildings structural systems and other structural components, including but not limited to the building frame, open-web floor trusses, partitions, elevator and stairwell shaft enclosures, and other elements that compartmentalize the building and structurally support it.

**REQUEST NO 73:**

Produce all documents which mention, discuss, refer or relate to spray-on fireproofing used on the structural components for the subject buildings, including but not limited to any reports or allegations of spraying fireproofing materials on rusted coated structural steel; improper adhesion of fireproofing on structural steel; installation of fireproofing in less than 40 degree weather; fireproofing being delaminated, falling off or otherwise failing to adhere to the structural steel of the subject buildings; all documents between Mario and DiBono Plastering Co. and/or Alcoa and/or United States Mineral Products Co., Inc. and/or W.R. Grace and/or any named defendant relating to spray-on fireproofing of the subject buildings.

**REQUEST NO 74:**

Produce all documents which mention, discuss, refer or relate to tests, fire tests, field test, or sampling of the adhesion of all fireproofing (including but not limited to asbestos containing fireproofing and all types of Cafco materials) on all structural elements or components of the subject buildings.

**REQUEST NO 75:**

Produce all documents which mention, discuss, refer or relate to the substitution of Cafco Glaze-shield D with Cafco Glaze-shield D/CF.

**REQUEST NO 76:**

Produce all documents which mention, discuss, refer or relate to any decision to change the thickness of the fireproofing materials applied to the structural components of the subject buildings at any time.

**REQUEST NO 77:**

Produce all documents which reflect the status of the fireproofing upgrade and/or rehabilitation project, including but not limited to any surveys, quality control reports, field reports, audits or inspections of the program from 1995 to September 11, 2001.

**REQUEST NO 78:**

Produce all documents which mention, discuss, refer or relate to the 1975 fire at 1 World Trade Center, 1977 blackout, 1980 bomb scare and 1990 power outage, and any modifications, renovations or improvements to the fire safety plan, fire protection system and/or emergency egress and evacuation systems which resulted from those incidents.

**REQUEST NO 79:**

Produce all documents which mention, discuss, refer or relate to any actual or reported fires at the subject buildings at any time.

**REQUEST NO 80:**

Produce all documents which mention, discuss, refer or relate to operation and capacity of the water supply system dedicated to the fire sprinkler system and fire suppression systems, including standpipes for the subject buildings prior to September 11, 2001 and immediately following the subject crashes up until the subject collapses.

**REQUEST NO 81:**

Produce all documents which mention, discuss, refer or relate to operation of the Radiax cable and antenna installed in the subject buildings complex for use in conjunction with the FDNY radios in the event of a fire.

**REQUEST NO 82:**

Produce all documents provided to or received from the World Trade Center's Fire Brigade.

**REQUEST NO 83:**

Produce all documents which mention, discuss, refer or relate to the automatic elevator override system for the subject buildings; any elevator discrepancies, accident

or incident reports or reports of elevators failing to operate properly for the last 10 years; all contracts with elevator contractors or subcontractors (including but not limited to Ace Elevators and Otis Elevators) responsible for elevator system operation, including any supplements or changes to the contracts and all letters and memorandum regarding same; all correspondence, reports, surveys, service records and related documents from any and all elevator technician, field engineers or operating engineers or other staff directed to or received from the Port Authority's Vertical Transportation Chief for the last 10 years.

**REQUEST NO 84:**

Produce all documents which mention, discuss, refer or relate to the operation and capacity of the emergency power system for the subject buildings including but not limited to emergency lighting systems , backup power for communications equipment, elevator systems, fire (water) pumps and telephone systems.

**REQUEST NO 85:**

Produce all documents received by or sent from the Port Authority's Risk Management Group which mention, discuss, refer or relate to the risks of fire, bombing, aircraft impact (intentional or accidental) or any terrorist threats.

**REQUEST NO 86:**

Produce all documents which mention, discuss, refer or relate to training provided to the World Trade Center Fire Brigade, Fire Safety Directors, Assistant Fire Safety Directors and Tenant/ Floor Fire Wardens, including but not limited to written curricula, guidelines, instruction and study aids as well as audio and video presentations.

**REQUEST NO 87:**

Produce all documents which mention, discuss, refer or relate to (a) the performance (frequency and method) and evaluation of fire drills conducted in the subject buildings; and, (b) demonstrate completion of any and all fire safety training programs and/or emergency egress and evacuation training programs.

**REQUEST NO 88:**

Produce all documents which mention, discuss, refer or relate to any assessments, technical evaluations, analysis, impact simulations, computer graphics, modeling, videotapes and photographs which describe or depict the structural damage to the subject buildings following the subject crashes.

**REQUEST NO 89:**

Produce all structural and/or load analyses, impact analyses, fireproofing ratings and tests, other structural safety tests, evaluations, assessments, simulations, computer

graphics, technical evaluations, reports or modeling of the subject buildings' structural system, elevator system, emergency egress and evacuation system and fire protection system prior to September 11, 2001; all documents which establish and determine design loads and impact loads for structural components of the subject buildings; all documents which establish and determine abnormal loads anticipated at the time of the original design and any modification changes or revisions to the abnormal load analysis following the 1993 bombing up until September 11, 2001.

**REQUEST NO 90:**

Produce all structural and/or load analyses, impact analyses, evaluations, assessments, simulations, computer graphics, technical evaluations, reports or modeling of (a) the subject buildings' structural system after the subject crashes up until the time of the subject collapses (including but not limited to any structural analysis performed using SAP-2000 software); (b) the spread of the subject fire; (c) the temperature of the structural members (d) structural effects of the subject fire (e) building loads from the time of subject crashes to collapse (f) progression of the collapse (g) the subject crashes effect on the adherence of spray-on fireproofing to steel components of the subject buildings.

**REQUEST NO 91:**

Produce all calculations, estimates, assessments, evaluations, analyses, simulations or models which mention, discuss, refer or relate to where jet fuel dispersed

in the subject buildings, how the jet fuel was consumed, and the time it took to consume the jet fuel from the subject aircraft.

**REQUEST NO 92:**

Produce all documents which mention, discuss, refer or relate to the development and spread of the subject fires.

**REQUEST NO 93:**

Produce all calculations, estimates, assessments, evaluations, analysis, simulations or modeling to estimate the rate of the fire energy output for the subject fires.

**REQUEST NO 94:**

Produce all documents which mention, discuss, refer or relate to the design criteria and actual floor loads for each floor of the subject buildings, (including but not limited to all floor loading inspection records, audits, surveys for the last ten years) and all correspondence or memoranda to or from tenants concerning floor loading.

**REQUEST NO 95:**

Produce all documents which mention, discuss, refer or relate to a message broadcast over the loudspeaker system indicating that World Trade Center 2 was secure and that occupants could return to their offices.

**REQUEST NO 96:**

Produce a list of World Trade Center contracts for the design and construction of the subject buildings, and produce all contracts which mention, discuss, refer or relate to the subject buildings' structural systems, fireproofing of structural components, fire protection systems (including but not limited to sprinkler systems, standpipes, fire department water connections), fire alarm system, water supply system available for fire suppression, smoke management ventilation system, primary, emergency and back-up power systems, emergency notifications (announcement) system, emergency communications systems, fire and emergency control centers, elevator systems, emergency egress and evacuation systems (including stairwells).

**REQUEST NO 97:**

Produce a copy of:

- a. FDNY High-Rise Firefighting Procedures, dated January 1, 1997;
- b. FDNY Radio Code Signals Manual; and
- c. FDNY Communications Manual.

**REQUEST NO 98:**

Produce the Port Authority Emergency Procedures Manual and all prior iterations and revisions, modifications or changes thereto.

**REQUEST NO 99:**

Produce the World Trade Center Fire Hydrant Map.

**REQUEST NO 100:**

Produce the World Trade Center Fire Safety Plan for the subject buildings in effect on September 11, 2001 and all prior iterations and revisions, modifications or changes thereto.

**REQUEST NO 101:**

Produce all Leslie E. Robertson Associates (“LERA”) World Trade Center structural integrity inspection reports, including but not limited to those relating to fireproofing.

**REQUEST NO 102:**

Produce a copy of the report by the New York Board of Fire Underwriters entitled *One World Trade Center Fire*, dated February 13, 1975.

**REQUEST NO 103:**

Produce the World Trade Center Fire Engineering of Steelwork Final Report and all documents which mention, discuss, refer or relate thereto.

**REQUEST NO 104:**

Produce the LERA Architectural and Structural Drawings Collection for the subject buildings.

**REQUEST NO 105:**

Produce the bid proposal(s) or submission(s) of Mario and DiBono Plastering Co. Inc on WTC Contract No.113 and all contracts between the Port Authority and Mario and DiBono Plastering Co. Inc., including but not limited to WTC Contract No. 113 and any revisions, amendments or supplements thereto.

**REQUEST NO 106:**

Produce World Trade Center Tenant Fire Safety Guide in effect on September 11, 2001 and all prior iterations and revisions, modifications or changes thereto.

**REQUEST NO 107:**

Produce FDNY Emergency Dispatch Logs for September 11, 2001.

**REQUEST NO 108:**

Produce a list of all World Trade Center Instruction Manuals and produce the following specific manuals:

- a. World Trade Center Instruction Manual No. 12, Operation and Maintenance of Smoke Detection System - Observation Deck, Tower B, dated August 1981;
- b. World Trade Center Instruction Manual No. 1, Operation and Maintenance of River Water Pump Station, dated October 1977.
- c. World Trade Center Instruction Manual No. 13, Operation and Maintenance of Halon Fire Protection System - Computer Center, WTC, dated December 1981; and
- d. World Trade Center Instruction Manual No. 15, Operation and Maintenance of Domestic Water System Towers A and B, World Trade Center.

**REQUEST NO 109:**

Produce all documents that establish policies, procedures, guidelines and instructions for the subject buildings' fire safety plan, fire protection plan, emergency egress, exiting and evacuation plans, operations control center and emergency/fire control centers.

**REQUEST NO 110:**

Produce all documents which mention, discuss, refer or relate to any terrorist threats, including but not limited to the threat of using civilian aircraft to strike the subject buildings.

**REQUEST NO 111:**

Produce all documents which mention, discuss, refer or relate to the subject buildings being a terrorist target because they are a symbol of American prosperity, wealth and success.

**REQUEST NO 112:**

Produce all documents received from any governmental agency concerning terrorist threats, including but not limited to the use of civilian aircrafts as weapons of mass destruction, as well as any security directives, briefings, works and/or information and circulars regarding terrorism and/or threats of terrorism activities for ten years preceding September 11, 2001.

**REQUEST NO 113:**

Produce all correspondence with the FAA (including but not limited to Air Traffic Control) and/or the airlines and/or any government agency on the subject of the possibility of aircraft striking the World Trade Center.

**REQUEST NO 114:**

Produce all documents which mention, discuss, refer or relate to any communications between the Port Authority or Silverstein and the FAA, FBI, CIA, NSC, Justice Department or any other Federal, State or City agencies regarding the heightened terrorist threats to the safety of the subject buildings during the year 2001.

**REQUEST NO 115:**

Produce all documentation concerning any security risk assessments or surveys performed or commissioned by either the Port Authority, Silverstein and/or any external contractors and/or in-house security firms between February 1993 and September 11, 2001 and produce copies of all contracts with security firms for the subject buildings since February 1993.

**REQUEST NO 116:**

Produce all documents which mention, discuss, refer or relate to any security improvements or enhancements or other changes following the February 1993 World Trade Center bombing.

**REQUEST NO 117:**

Produce all documents including but not limited to memorandum, correspondence and/or minutes from any meetings wherein the following subjects were discussed:

- a. The World Trade Center as a terrorist target;
- b. The use of aircraft to strike the World Trade Center;
- c. The possibility of any aircraft striking (intentionally or accidentally) the World Trade Center;
- d. The February 1993 World Trade Center bombing (including any discussions on security, fire safety, emergency egress and evacuation, fire protection and improvements for changes as a result thereof);

- e. Reports or allegations concerning delamination or failure of fire proofing materials to adhere to the structural components of the subject buildings, inadequate application of fireproofing materials; and/or the need to increase the thickness of the fireproofing coating for the structural components of the subject buildings;
- f. The subject buildings' fire protection system, emergency egress evacuation system, elevator system, water supply system for fires and emergency power systems;
- g. Emergency evacuation during fire or other emergency from the top (roof) of the subject buildings;

**REQUEST NO 118:**

Produce all documents which mention, discuss, refer or relate to any investigation into (a) the February 1993 bombing of the World Trade Center and (b) 1975 World Trade Center Tower 1 building fire.

**REQUEST NO 119:**

Produce all documents which mention, discuss, refer or relate to safety and performance of open-web steel truss joints under fire, impact and other local conditions.

**REQUEST NO 120:**

Produce all documents which mention, discuss, refer or relate to the structural reserve capacity of the subject buildings to accommodate loads such as blasts, impacts and/or fires.

**REQUEST NO 121:**

Produce all documents not identified in response to Request No. 4 above provided to and received from the FDNY regarding fires, fire safety, and fire protection or emergency evacuation of the subject buildings.

**REQUEST NO 122:**

Produce all documents which mention, discuss, refer or relate to any and all remedial maintenance, alteration, renovation, upgrade, repair or other structural work performed on the subject buildings structural system, elevator system, evacuation and egress system and fire protection system from 1972 to September 11, 2001.

**REQUEST NO 123:**

Produce all documents which mention, discuss, refer or relate to any changes, modifications, renovations or upgrades to the subject buildings structure performed by tenants from 1972 to September 11, 2001.

**REQUEST NO 124:**

Produce all correspondence, letters, memorandums or other records between Port Authority and/or Silverstein and each of the World Trade Center present and former tenants which mention, discuss, refer or relate to security and/or fire safety in the subject buildings at any time during the last 10 years.

**REQUEST NO 125:**

Produce all RFIs (requests for information) submitted by any and all contractors during the design and construction of the subject buildings, including but not limited to the structural systems, fireproofing of structural components, fire protection systems (including but not limited to sprinkler systems, standpipes, fire department water connections), fire alarm system, water supply system available for fire suppression, smoke management ventilation system, primary, emergency and back-up power systems, emergency notifications (announcement) system, emergency communications systems, fire and emergency control centers, elevator systems, emergency egress and evacuation systems (including stairwells).

**REQUEST NO 126:**

Produce all documents including letters, correspondence and minutes of all job meetings between Port Authority officials, WTC construction manager(s), WTC project managers, field engineers, contractors, sub-contractors and their representatives during the design and construction of the subject buildings concerning the structural systems, fireproofing of structural components, fire protection systems (including but not limited to sprinkler systems, standpipes, fire department water connections), fire alarm system, water supply system available for fire suppression, smoke management ventilation system, primary, emergency and back-up power systems, emergency notifications (announcement) system, emergency communications systems, fire and emergency control centers, elevator systems, emergency egress and evacuation systems (including stairwells).

**REQUEST NO 127:**

Produce all documentation of any complaints regarding safety, security, fire protection and evacuation issues received by the Port Authority's Inspector General Office between 1992 and 2001, and any rulings and/or findings regarding said complaints.

**REQUEST NO 128:**

Produce all documentation including notices, bulletins or memoranda provided to tenants of the subject buildings which outline or detail the changes in security, fire safety and/or evacuation procedures following the subject buildings reopening after the February 1993 bombing.

**REQUEST NO 129:**

Produce copies of any transcript or audio tape recording of any and all communications from the FAA including but not limited to air traffic control personnel at the New York TRACON and/or Kennedy, Laguardia or Newark airport air traffic control to the Port Authority on September 11, 2001.

**REQUEST NO 130:**

Produce all copies of any evacuation plans for the observation deck of World Trade Center Tower 2 and all prior iterations and revisions, modifications or changes thereto.

**REQUEST NO 131:**

Produce a copy of the fire command center and/or control center operating manual in effect on September 11, 2001 and all prior iterations and revisions, modifications or changes thereto.

**REQUEST NO 132:**

Produce a copy of the following correspondence, letters, memoranda, reports or recordings from:

- a. Letter from Malcolm P. Levy, Chief, Planning Division, Port Authority to Milton Gerstman, Tishman Realty, dated May 14, 1969;

- b. Letter from Malcolm P. Levy regarding the design of the steel floor deck dated April 20, 1965;
- c. Memorandum from Lester S. Feld, Chief Structural Engineer of the Port Authority, dated February 15, 1987;
- d. Report from Skilling, Helle, Christiansen and Robertson regarding the fire on the 14<sup>th</sup> floor of the North Tower in February 1975;
- e. Fire Test R4374; 68NK2435 performed by Underwriters Laboratories Inc. of Northbrook, IL on July 26, 1969;
- f. Letter from Tishman Realty to the Port Authority, dated May 26, 1969.
- g. Office Space Design Guide used by the Port Authority in the design of the subject buildings;
- h. Letter from Malcolm P. Levy to Minoru Yamasaki, dated September 29, 1965;
- i. Letter from Malcolm P. Levy to Emery Roth and Sons regarding fire proofing, dated December 27, 1965;
- j. Letter from Robert J. Linn, Manager, Project Planning, the World Trade Center to Louis DiBono, Mario and DiBono Plastering Co, Inc. regarding fire proofing specifications;
- k. Letter from Douglas Fernandez of Emery Roth to Joe Swartzman of the Port Authority;
- l. Memorandum from JF Rouke of US Mineral Products (USM) to James Verhalen, re: fireproofing, dated July 9, 1964;

- m. Memorandum from Irv Soffer (PA) to Herbert Tessler (PA) re: Cafco fireproofing, dated May 4, 1965;
- n. USM presentation and brochure re: Cafco Glaze-shield Type "D" for Fireproofing of the World Trade Center, 1966-67;
- o. International Testing Laboratories bond strength test on Cafco Glaze-shield Type D, dated January 11, 1966;
- p. Notes from meeting to discuss difficulties of wall erection and exterior wall fire-proofing, dated February 28, 1966;
- q. Letter and enclosed Fireproofing Cost Comparison, World Trade Center from James R. Endler, Assistant Vice President Tishman Realty (TRCC) to Ray Monti, Engineer, World Trade Center, dated March 30 1966;
- r. Column fireproofing and rain exposure weather test done by USM Research Department with Cafco, dated August 12, 1966;
- s. Dusting and flaking test of Cafco Glaze-shield, dated August 16, 1966;
- t. Letter and technical data sheets re: Mono-Kote from WR Grace to ER & Sons, dated December 13, 1966;
- u. Letter from Joe Soloman, (ER &S), to Tessler (PA) re: spray-on fireproofing, dated January 16, 1967;
- v. Memorandum by PA re: spray-on asbestos based fire-proofing and its propensity to flake off, dated January 30, 1967;

- w. Letter from Harry S. Gropp, USM to DiBono re: fire-proofing elevator shafts, dated April 4, 1967;
- x. Memorandum by PA re: test spraying of columns and spandrals in Aloca-Cupples plant in St. Louis, dated August 8, 1967;
- y. Letter from Louis DiBono to Ray Monti, PA re: tests of spray-on fireproofing on trusses in Stanhope, NJ on September 13, dated September 26, 1967;
- z. Letter from John J. O'Keeffe, Cupples to AJ Faranda, ARI Construction Corp. re: performance of Cafco, dated November 13, 1967;
- aa. Letter response from Harry Gropp, USM to DiBono re: performance of Cafco, dated November 24, 1967;
- bb. Letter from Harry Gropp, USM to DiBono re: field test of Cafco for weather exposure, dated February 28, 1968;
- cc. Letter from DiBono to Francis H. Werneke (PA) re: sprayed steel mock-up field test with Cafco Type D on steel columns and spandrals, dated March 1, 1968;
- dd. Letter from Harry Gropp, USM to PA and others with a report on field test of Cafco Type D on columns and beams, dated March 1, 1968;
- ee. Memorandum from Werneke (PA) to Levy (PA) and Endler (TRCC) re: fireproofing tests, dated March 6, 1968;
- ff. Cafco application manual, dated July 1, 1968;

- gg. Memorandum by PA re: criteria specifications for fireproofing, dated February 13, 1969;
- hh. Memorandum from TRCC to PA re: specification discrepancy on the overspray between Mark II and Mark III types, dated June 25, 1969;
- ii. Letter from Endler (TRCC) to Tozzoli (PA) re: Dr. Selikoff's comments about the use of spray-on fire-proofing containing asbestos, dated September 15, 1969;
- jj. Letter from Joseph M. Lucarelli of Star-Circle Wall Systems to Ray Monte (PA) re: insulation specifications for Cafco Type D, dated October 7, 1969;
- kk. Memorandum and attached letters from DiBono re: rust and cleaning of steel components, dated October 14, 1969;
- ll. Memorandum from Harry Gropp (USM) to Frank Stumpf re: applying more than one coat of Cafco Type D, dated November 19, 1969;
- mm. Notes on meeting at TRCC, dated December 10, 1969;
- nn. Memorandum from Harry Gropp (USM) to James P. Verhalen re: Cafco Glaze-shield D/CF, dated December 11 1969;
- oo. Memorandum from Al Bessemer (USM) to Harry Gropp and James Verhalen re: Cafco, dated December 14, 1969;
- pp. Memorandum from Ray Monti (PA) re: Cafco Blazeshied Type D, dated December 29, 1969;

- qq. Memorandum from Smith (PA) to Gerstman (TRCC), dated January 13, 1970;
- rr. Letter from Lucarelli to TRCC, dated January 23, 1970, and response dated February 24, 1970;
- ss. Memorandum from Gerstman (TRCC) to Robert Linn (PA), dated February 2, 1970;
- tt. Memorandum from Gropp (USM) to Verhalen, dated March 4, 1970;
- uu. Notes on construction meeting at TRCC, dated March 17, 1970;
- vv. USM Letter to DiBono listing physical properties of Mark II coating, dated March 23, 1970;
- ww. Memorandum by PA re: asbestos spray-on fireproofing, dated March 25, 1970;
- xx. Memorandum by PA from Linn to Joseph Milano re: Mark II coating process, dated March 25, 1970;
- yy. Memorandum from David Brown (PA) to Bert Weinstein (TRCC) re: fire-proofing coating thickness on core columns, dated March 25, 1970;
- zz. Memorandum from TRCC re: fire-proofing coating thickness on core columns, dated March 30, 1970;
- aaa. Memorandum by Alcoa re: applying Cafco fire-proofing at the Twin Towers, from JD Minford to CJ Walton, of Alcoa Research Laboratories, dated March 31, 1970;

- bbb. Memorandum by Endler (TRCC) to Star Circle re: Cafco Glaze-shield D, dated April 6, 1970;
- ccc. Memorandum from WR Grace, RM Vining, re: non-asbestos material, dated April 10, 1970;
- ddd. Alcoa letter to Tozzoli (PA), dated April 23, 1970;
- eee. Letter from SW Bell of Underwriters Laboratories Inc to Ray Monti (PA) re: tests of the non-asbestos Cafco Glaze-shield D/CF, dated April 24, 1970;
- fff. Memorandum from TRCC re: Cafco, specifications, dated April 24, 1970;
- ggg. Letter and test list from Harry Gropp (USM) to DiBono re: thermal conductivity test on Cafco D/CF, dated April 30, 1970;
- hhh. Letter from TRCC to Alcoa re: Mono-Kote, dated May 1, 1970;
- iii. Letter from Alcoa re: Cafco-Glaze-shield D/CF, dated May 1, 1970;
- jjj. Test sheet from International Testing Laboratories of Newark, NJ, dated May 5, 1970;
- kkk. Letter from PA to Alcoa re: use of non-asbestos fire-proofing, dated May 8, 1970;
- lll. Letter from Linn (PA) to William Bracco (TRCC), dated May 11, 1970;
- mmm. Letter from Ray Monti (PA) to DiBono re: use of Cafco Glaze-shield, dated May 14, 1970;

- nnn. Memorandum from Ray Monti (PA) to others re: fireproofing substitution, dated May 15, 1970;
- ooo. Letter from Austin Tobin (PA) to NY Commissioner Robert N. Rickles re: substitution, dated May 21, 1970;
- ppp. USM letter to PA re: Cafco D/CF, dated May 28, 1970;
- qqq. Letter from Frank Tartamella (DiBono) to Abe Levine (TRCC) re: degradation of the open web truss fire-proofing by contractors installing ducts, dated June 24, 1970;
- rrr. Memorandum from J.Dean Minford of Alcoa Research Laboratories re: Cafco D/CF Fireproofing Evaluation XF-1347, dated September 2, 1970.
- sss. Memorandum from Tartamella (DiBono) to Weinstein (TRCC) re: damage to the fire-proofing, dated September 10, 1970;
- ttt. Letter and list from Weinstein (TRCC) to Tartamella (DiBono) re: deficiencies in fire-proofing coverage, dated September 24, 1970;
- uuu. Letter from Tartamella (DiBono) to TRCC re: damage to fire-proofing, dated December 17, 1970;
- vvv. Memorandum from CA Smith (PA) to Gerstman (TRCC) re: deficiencies in fire-proofing in elevator shafts, dated March 19, 1971; and
- www. Memorandum from Smith (PA) to Gerstman (TRCC), re: spray-on fire-proofing, dated April 1, 1971;

xxx. Letter from Tartamella (DiBono) re: fire-proofing, dated May 10, 1971.

**REQUEST NO 133:**

Produce all documents directed to or received from FEMA and/or NIST concerning the investigation into the causes into the fire and collapse of 7 World Trade Center on September 11, 2002.

**REQUEST NO 134:**

Produce all documents which mention, discuss, refer or relate to the applicable fire safety codes and regulations and other safe engineering practices and standards used in the design and construction of 7 World Trade Center.

**REQUEST NO 135:**

Produce all documents which mention, discuss, refer or relate to the location and design of all diesel fuel storage tanks, pumps, pipes, generators and related systems at 7 World Trade Center.

**REQUEST NO 136:**

Produce all engineering studies, surveys, reports, and/or fire safety evaluations, surveys or reports or any other documents which mention, discuss, refer or relate to the placement of the diesel fuel storage tanks and its accompanying systems in 7 World Trade Center.



**REQUEST NO 137:**

Produce all documents which mention, discuss, refer or relate to placement of the diesel fuel storage tanks in close proximity to the 7 World Trade Center building support structure.

Dated: New York, New York  
December 3, 2002

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