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Author

Corporate Author

Report/Article Title Agent Orange Litigation Team, 1984

Journal/Book Title

Year 0000

Month/Day

Color ☐

Number of Images 0

Descripton Notes Items filed together under the above title. Includes personnel lists, deposition digest, and procedures for document reviewers.

RESPONSIBILITY FOR "AGENT ORANGE" USE

AIR FORCE	78%
ARMY	20%
NAVY	2%

MAKE UP OF PROJECT

ARMY		3
	MSC	1
	CHEM	1
	DAC	1
AIR FORCE		2
NAVY		2
USMC		1
USPHS		1
VETERANS ADMINISTRATION		1
CONTRACTOR		22
		32

SEARCH REQUIREMENTS

FOR INFORMATION

	PROJECT	
	START	REMAINING
AIR FORCE	20%	10%
ARMY	70%	30%
NAVY	100%	40%
USMC	100%	40%

TOTAL DOCUMENTS PROVIDED

4,700

TOTAL PAGES REVIEWD

250,000

TOTAL DAYS OF OPERATION

84

REMAINING PAGES ESTIMATED

60,000

REMAINING DAYS OF OPERATION

21

SOURCES OF INFORMATON

WHITE HOUSE

DEPT. OF STATE

DEPT. OF DEFENSE

DEPT. OF ARMY

DEPT. OF NAVY

DEPT. OF AGR.

N. I. H.

N. A. S.

ARMY WAR COLLEGE

DCSOPS

DCSRDA

ETC. . .

R. Kainz
TASK COORDINATOR

CONTRACT REVIEW SERVICE*

B. Buckingham
CO-TASK COORDINATOR

R. Kainz
TOXICOLOGY AND ADVERSE HEALTH EFFECTS

S. Schaub
WATER - ENV. HEALTH EFFECTS CHEMISTRY

- L. Solomon
- ~~D. Carnevale~~

John Headen
ARMY POLICY
CHEMICAL CORP
HERB DOCTRINE

- ENVIRONMENTAL SCIENTIST
  - E. CAMPBELL
  - D. SIMMONS
- C. Bartlett
- M. HOLMES
- ~~W. Anderson~~
- R. Bates
- ~~M. Holmes~~
  - W. ANDERSON
  - E. CAMPBELL

B. Buckingham
AIR FORCE
DOD POLICY
STATE DEPT POLICY

- G. Whately
  PARALEGAL
- ~~Un-Named PARALEGAL~~

S. Blackhurst
CACI PROJECT MANJ.
DOCUMENT REVIEW

- F. Landers — D. Blande
  DOC. CNTRL. — DOC. CNTRL.
- R. Doby
  CLERK
- D. Bell
  DATA PROCESSOR
- K. Hill
  DEPOSITIONS
  - L. Young, PARALEGAL
  - J. Chaffee, PARALEGAL
- H. McGlade
  Alvin Young's LIBRARY
  ~~Library~~ PTCS
  - H. Wilson, PARALEGAL — E. Joyce, PARALEGAL
  - J. Norris, PARALEGAL — C. Goffe, PARALEGAL
- G. Acker
  LEGAL SUPPORT
  SAFEWAY
- J. Hsia
  LEGAL SUPPORT
  SAFEWAY
- R. Scotton
  LEGAL SUPPORT
  SAFEWAY
- COMPUTER CODING

CONTRACT SEARCH
DLA
DCA
PARALEGAL
PARALEGAL

STAFF	PRESENT	PROJECTED	LOSS
SCIENCE	10	10	1
SUPPORT	15	24	0
ADMIN	5	4	1
TOTAL	26	38	3

* one contract for service

THIS COPY UPDATED JULY 30

PERSONNEL LIST

Re: In re "Agent Orange" Product Liability Litigation, MDL No. 381

Trial Attorneys

Arvin Maskin (O)724-6744 (H)652-7139	No Negligence; U.S. acted reasonably under circumstances
Gretchen Witt (O)724-6725 (H)589-5042	Federal Tort Claims Act Defenses
Robert Longstreth (O)724-7953 (H)544-5803	Issues: U.S. owes no duty to Plaintiffs or Third Party Plaintiffs. Includes all contract issues.
Patrick Cavanaugh (0)724-6888 (H)255-0908	Causation re Miscarriages & Birth Defects
Judith Sack (0)724-6734 (H)654-1877	No Negligence U.S. acted reasonably under all the circumstances
Leon Taranto (O)724-6812 (H)(301)-589-5660	Causation re Miscarriages & Birth Defects

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Michael Fawcett (0)724-6812 (H)536-2950	Safeway Document Coordination
Clarisse Abrams (0)724-7662 (H)250-9017	Litigation Support Case Manager

NAME	AREAS	PHONE Home	PHONE Work
Robert Kainz	ARMY MAJOR Toxicology Adverse Health Effects	(301)-845-2089	(202)-783-8620
Steve Schaub	ARMY DAC Water-Environment Health Effects Chemistry	(301)-795-6821	(202)-783-8625
Bill Buckingham	AIR FORCE MAJOR DOD Policy Dept. of State Policy	(703)-321-8490	G St. (202)-783-8621 (202)-693-1383/ 1393 or 767-5088
John Headen	ARMY MAJOR/VA Army Policy Chemical Corps Herb Doctrine	(301)-292-0396	(202)-783-8627
Charles Bartlett	ARMY LTC Army Chemical Corps Officer/Chem Opns.	(202)-328-0860	(202)-783-8627
Roger Bates	NAVY CDR International Affairs	(703)-941-4371	(202)-783-8627
Mike Holmes	NAVY CDR International Affairs	(703)-922-9421	(202)-783-8627
Larry Solomon	PHS LCDR Environmental Science	(301)-585-2780	(202)-783-8621
David Carpenter	State Dept. -- foreign Affairs	--	--
William Anderson	MARINE CORPS, JAG USMC -- History, Operations, Policy	(703)-821-8673	(202)-783-8627
CACI STAFF			
Steve Blackhurst	C.A.C.I. INC. Project Manager	(202)-347-8827	(202)-783-8622

Henry McGlade	Supervisor -- Shoreham Paralegal's	(301)-229-0337	(202)-376-8858
Jean Chaffee	Paralegal	(703)-978-2475	(202)-783-8624
James Norris	Paralegal	(202)-686-0257	(202)-376-8858
Curtis Goffe	Paralegal	(703)-548-7440	(202)-376-8858
Holly Wilson	Paralegal	(202)-364-8466	(202)-376-8858
Keith Hill	Supervisor -- G Street Paralegal's	(202)-882-5637	(202)-783-8624
Louis Young	Paralegal	(301)-664-6336	(202)-783-8624
Denise Bland	Doc. Control	(301)-568-6677	(202)-783-8624
Gail Whatley	Doc. Control	(703)-960-3182	(202)-783-8624
Elise Joyner	Paralegal	(301)-336-3938	(202)-783-8625
Frances Landers	Document Control	(703)-971-2046	(202)-783-8624
Dan Bell	Data Processor	(703)-660-6490	(202)-783-8624
Robert Doby	Clerk	(301)-921-4365	(202)-783-8624
Rick Scotton	Supervisor -- Safeway Paralegal's	(301)-270-4251	(202)-783-8623
Elizabeth Jarrell	Paralegal	(301)-530-3291	(202)-783-8624
Gregory Campbell	Paralegal	(202)-829-8772	(202)-783-8624
Dave Simmons	Paralegal	(703)-525-8344	(202)-783-8627
James Hsia	Paralegal	(301)-495-3191	(202)-783-8624
Gary Acker	Clerk	(703)-892-5673	(202)-724-7954

THIS COPY UPDATED August 8, 1984

PERSONNEL LIST

Re: In re "Agent Orange" Product Liability Litigation, MDL No. 381

Trial Attorneys

Arvin Maskin (O)724-6744 (H)652-7139	No Negligence; U.S. acted reasonably under circumstances
Gretchen Witt (O)724-6725 (H)589-5042	Federal Tort Claims Act Defenses
Robert Longstreth (O)724-7953 (H)544-5803	Issues: U.S. owes no duty to Plaintiffs or Third Party Plaintiffs. Includes all contract issues.
Patrick Cavanaugh (0)724-6888 (H)255-0908	Causation re Miscarriages & Birth Defects
Judith Sack (0)724-6734 (H)654-1877	No Negligence; U.S. acted reasonably under all the circumstances
Leon Taranto (O)724-6812 (H)(301)-589-5660	Causation re Miscarriages & Birth Defects
Faith Burton (O) 724-6701 (H) 244-4027	Contribution and Indemnification

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Michael Fawcett (0)724-6812 (H)536-2950	Safeway Document Coordination
Clarisse Abrams (0)724-7662 (H)250-9017	Litigation Support Case Manager

AGENT ORANGE LITIGATION PROJECT

NAME	AREAS	PHONE Home	PHONE Work
Robert Kainz	ARMY MAJOR CHAIRMAN "A.O." L.P. Toxicology Adverse Health Effects	(301)-845-2089	(202)-783-8620
Steve Schaub	ARMY DAC Water-Environment Health Effects Chemistry	(301)-795-6821	(202)-783-8625
Bill Buckingham	AIR FORCE MAJOR DOD Policy Dept. of State Policy	(703)-321-8490	G St. (202)-783-8621 (202)-693-1383/1393 or 767-5088
John Headen	ARMY MAJOR/VA Army Policy Chemical Corps Herb Doctrine	(301)-292-0396	(202)-783-8627
Charles Bartlett	ARMY LTC Army Chemical Corps Officer/Chem Opns.	(202)-328-0860	(202)-783-8627
Roger Bates	NAVY CDR International Affairs	(703)-941-4371	(202)-783-8627
Mike Holmes	NAVY CDR International Affairs	(703)-922-9421	(202)-783-8627
Larry Solomon	PHS LCDR Environmental Science	(301)-585-2780	(202)-783-8621
William Anderson	MARINE CORPS, JAG USMC -- History, Operations, Policy	(703)-821-8673	(202)-783-8627
Tim Lynch	AIR FORCE, Auditor		(202)-783-8625
CACI STAFF			
Steve Blackhurst	C.A.C.I. INC. Project Manager	(202)-347-8827	(202)-783-8622

Henry McGlade	Supervisor -- Shoreham Paralegal's	(301)-229-0337	(202)-376-8858
Jean Chaffee	Paralegal	(703)-978-2475	(202)-783-8624
James Norris	Paralegal	(202)-686-0257	(202)-376-8858
Curtis Goffe	Paralegal	(703)-548-7440	(202)-376-8926
Holly Wilson	Paralegal	(202)-364-8466	(202)-376-8915
Keith Hill	Supervisor -- G Street Paralegal's	(202)-882-5637	(202)-783-8624
Louis Young	Supervisor -- Misc. Searches Paralegal's	(301)-664-6336	(202)-783-8624
Denise Bland	Document Control	(301)-568-6677	(202)-783-8624
Gail Whatley	Document Control	(703)-960-3182	(202)-783-8624
Elise Joyner	Paralegal	(301)-336-3938	(202)-783-8625
Frances Landers	Document Control	(703)-971-2046	(202)-783-8624
Dan Bell	Data Processor	(703)-660-6490	(202)-783-8624
Robert Doby	Clerk	(301)-921-4365	(202)-783-8624
Rick Scotton	Supervisor -- Safeway Paralegal's	(301)-270-4251	(202)-783-8623
Elizabeth Jarrell	Paralegal	(301)-530-3291	(202)-783-8624
Gregory Campbell	Paralegal	(202)-829-8772	(202)-783-8624
Dave Simmons	Paralegal	(703)-525-8344	(202)-783-8627
James Hsia	Paralegal	(301)-495-3191	(202)-783-8624
Gary Acker	Clerk	(703)-892-5673	(202)-724-7954
Karen Katchmeric	Paralegal	(703)-751-4437	(202)-783-8624
Leon Anderson	Paralegal	(301)-439-5308	(202)-783-8624

Agent Orange Litigation Deposition Digest

Deponent	Date of Depostion	Date Rcd from DOJ	Date Rtd to DOJ
Anderson, A.W.	09/29/82	05/09/84	6/25/84
Anderson, R.	09/08/82		
Anderson, G.A.	3/22/83		
Andreoli, R.L.	21/23/83	07/09/84	
Angel, J.	09/13/83	5/07	6/28
Arnoldi, L.B.	9/12/83		
Arvan, P.G.	11/28/83	5/07	6/29
Arvan, P.G.	04/06/84	07/09/84	
Atkinson, R.A.	12/20/83	5/09	6/22
Atkinson, J.C.	5/2/83		
Atkinson, J.C.	6/14/83		
Bak, E.	1/27/83	07/09/84	
Baldeschwieler, J.D.	03/13/84	5/03	6/29
Baldeschwieler, J.D.	08/04/33	4/30	6/21
Ballman, D.K.	11/01/83	4/30	6/21
Barthel, W.F.	11/18/82		
Barthel, W.F.	7/11/83		
Bates R.R.	7/21/82		
Bauer, G.L.	02/11/83	5/09	6/19
Beatty, G.	3/27/84		
Betts, R.H.	11/10/83	5/09	7/12
Bing, P.S.	07/15/83	5/09	6/29
Birmingham, D.	8/26/82	07/09/84	
Birmingham, D.	8/27/82	07/09/84	

Deponent	Date of Deposition	Date Rcd from DOJ	Date Rtd to DOJ
Blair, E.	03/27/84	5/09	6/21
Blair, E.H.	3/31/83	5/03	6/01
Bock, E.J.	4/17/84	07/09/84	
Bohl, C.D.	3/30/84	07/09/84	
Bontoyan W.R.	6/13/83		
Borror, J.A.	10/21/83	5/07	7/02
Boyer, L.	2/10/83	07/09/84	
Brown, H.	01/20/83	5/09	7/02
Buckley, J.L.	08/17/83	5/09	6/27
Buckley, J.L.	09/22/82	5/09	7/17
Burcham, L.T.	1/20/83	07/09/84	
Burton, J.E.	3/17/83	07/09/84	
Bush, J.S. jr.	2/22/83		
Bushey, C.E.	2/14/83	07/09/84	
Bushy, C.E.	1/19/84	07/09/84	
Byerly, T.C.	12/09/82	07/09/84	
Byers, D.H.	6/18/83		
Callahen, J.	11/16/82	6/01	7/19
Calvin, M.	11/09/83	5/07	6/25
Calvin, M.	12/02/83	4/30	5/10
Cawthorne, D.M.	8/15/83		
Chandler, E.L.	12/08/83	5/09	7/12
Chonoles, R.L.	10/17/83	5/07	7/02
Christofano, E.H.	02/09/84	5/03	5/29
Christofano, E.H.	02/10/84	5/03	5/23

Deponent	Date of Depostion	Date Rcd from DOJ	Date Rtd to DOJ
Coates, J.F.	7/14/83	07/09/84	
Codario, R.A.	03/25/84	4/30	6/19
Connel, G.W.	8/15/83	07/09/84	
Codario, R.A.	03/26/84	4/30	5/29
Courtney D.	7/4/83		
Courtney D.	7/27/82		
Courtney, K.D.	3/20/84	6/05	7/19
Cox, N.H.	02/01/83	6/05	6/21
Cox, R.E.	2/07/84	07/09/84	
Cox, R.E.	12/08/82	6/01	7/19
Crawford, W.	02/15/83	6/01	6/29
Creasy, W.M.	07/18/83	5/09	6/22
Crittenden, E.	2/10/84	5/03	5/23
Crummett, W.	09/16/83	5/21	6/25
Cutright, E.A.	01/18/84	4/30	7/17
Daniels, R.G.	8/09/83	07/09/84	
Darrow, R.A.	07/13/82	5/03	6/01
Dashiell, T.R.	02/10/83	5/03	6/29
Delmore, F.J.	02/02/83	4/30	5/31
Dipaolo, J.A.	1/18/83		
Dolin, D.	10/20/83	5/07	6/21
Dotson, L.E.	11/02/83	4/30	6/21
Doty, P.	09/07/83	4/30	6/25
Douglas, F.G.	10/04/83	5/07	7/02
Doyle, H.N.	8/30/83		
Dubridge, L.A.	02/22/83	5/09	7/12
DuGuid, R.H.	8/12/83		
Dunn, C.L.	03/08/84	5/03	6/27

Deponent	Date of Deposition	Date Rcd from DOJ	Date Rtd to DOJ
Dunn, C.L.	04/28/83	5/09	6/25
Early, J.D.	11/04/83	4/30	6/28
Eckhaus, S.R.	09/23/82	5/03	7/19
Eckhaus, S.R.	10/06/82	4/30	6/12
Eckhaus, S.R.	3/13/84	5/10	6/29
Edwards, F.I.	01/13/83	5/09	6/27
Endicott, K.M.	5/2/83		
Ennis, W.B.	10/19/82	4/30	5/23
Essman, G.C.	08/01/83	5/09	6/25
Evans, T.H.	03/30/84	6/01	7/02
Ewalt, G.W.	02/20/84	5/04	7/17
Ewalt, G.W.	02/21/84	5/04	7/12
Fairclough, W.A.	11/22/83	5/07	6/21
Falconer, D.W.	07/15/82	5/09	6/22
Falsey, W.F.	10/24/83	4/30	6/29
Fenner, W.A.	01/19/83	5/03	7/11
Firestone, D.	10/14/82	6/01	6/27
Firestone, D.	9/21/82	07/09/84	
Fischbach, H.	1/5/83		
Fishbein, L.	12/14/82	07/09/84	
Fitzhugh, A.G.	1/20/83		
Fitzhugh, A.G.	3/28/83		
Ford, D.L.	02/20/84	4/30	5/31
Ford, D.L.	02/21/84	4/30	5/10
Ford, J.J.	02/09/84	4/30	7/19
Foster, J.	12/15/82	5/09	7/11
Frawley, J.P.	3/08/83	5/03	6/28

Deposition	Date of Deposition	Date Rcd from DOJ	Date Rtd to DOJ
Frawley, J.P.	02/07/84	5/03	6/21
Frawley, J.P.	02/08/84	5/03	6/25
Fredericks, H.G.	12/17/82	07/09/84	
Friess, S.L.	12/7/82		
Fryklund, V.C. jr.	8/25/83		
Fuhlhage, D.W.	10/04/83	5/03	5/29
Galston, A.W.	03/15/84	4/30	6/22
Galston, A.W.	03/16/84	4/30	5/10
Gardner, J.H.	02/24/83	5/03	6/01
Gastineau R.M.	6/28/83		
Gehring, P.J.	01/10/84	5/03	6/22
Gerety, J.H.	2/17/83	07/09/84	
Gervasoni, T.R.	2/28/84		
Gill, H.H.	03/10/83	5/03	5/10
Gill, H.H.	03/25/83	5/03	5/23
Gill, H.H.	12/20/83	5/03	6/21
Gordon, N.	5/5/83		
Granito, C.E.	02/07/83	5/09	6/29
Griffin, H.E.	7/11/83	07/09/84	
Groth, D.H.	7/20/82	07/09/84	
Hager, F.M.	3/29/84	07/09/84	
Harkins, P.D.	08/22/83	4/30	5/31
Harris, B.	11/10/82		
Harris, W.D.	10/25/83	5/07	6/29
Hart, E.R.	6/29/83	07/09/84	
Hart, W.	10/03/83	5/09	6/29

Deponent	Date of Deposition	Date Rcd from DOJ	Date Rtd to DOJ
Hay, A.	3/26/84	5/09	7/27
Hayes, W.J.	4/07/83	07/09/84	
Hays, H.W.	12/09/82	07/09/84	
Hayward, A.E.	03/10/83	5/03	5/29
Heaston, R.J.	8/11/83	07/09/84	
Hebbeler, J.A.	12/02/82	07/09/84	
Hebbeler, J.A.	07/14/83	5/09	6/33
Heiman H.	4/13/83		
Helm, D.G.	11/16/83	5/09	7/02
Herrero, B.A.	8/31/83	07/09/84	
Hickman, R.A.	12/01/83	4/30	6/21
Higginbotham, G.R.	9/16/82		
Hobson L.	4/12/84		
Hobson L.	4/13/84		
Hochberg, M.	3/23/84	07/09/84	
Hoffman, P.F.	11/22/83	5/07	7/11
Holdeman, G.	11/30/83	5/09	6/28
Holder, B.B.	01/6/84	5/03	6/22
Holmes, R.D.	3/23/84	07/09/84	
Horton, r.	10/21/82	6/01	7/17
Horton, R.G.	8/23/83	07/09/84	
Horwitz W.	5/2/83		
Houk, V.	3/26/84		
Houk, V.	3/27/84		
Houseright, R.C.	02/03/83	5/09	6/25
Irish, K.R.	07/26/82	5/09	6/25
Jacobson K.H.	11/24/82		
Jandorf, B.J.	6/29/82	6/01	7/19

Deponent	Date of Deposition	Date Rcd from DOJ	Date Rtd to DOJ
Jandorf, B.J.	7/01/82	6/01	7/19
Jefferies, M.A.	02/15/84	4/30	6/25
Johnson, J.	03/07/84	5/07	7/06
Jordan, C.A.	02/24/84	6/01	7/13
Jordan, D.F.	02/23/84	5/04	6/12
Jordan, D.F.	02/24/84	5/04	6/28
Jordan, D.G.	02/22/84	5/04	5/10
Jordan, D.G.	4/30/84	5/04	5/23
Jordan, David	09/14/83	5/07	6/19
Jordan, M.	02/24/84	6/01	6/27
Kaplan, A.S.	01/25/83	5/09	6/29
Kearney, P.C.	08/03/82	5/09	7/11
Kearney, P.C.	08/16/82	5/09	6/28
Keeny, S.M.	04/29/83	5/09	7/11
Kelly, R.E.	11/30/83	5/03	7/11
Kelly, R.E.	02/14/84	5/03	7/06
Kempson, G.C.	01/20/84	5/03	6/12
Kennedy, D.F.	01/21/83	5/09	7/02
Key, M.	07/30/82	6/01	7/13
Key, M.M.	7/8/82		
King, J.O.	3/16/84	07/09/84	
Kinne, H.C.	3/14/84	07/09/84	
Kissinger, H.	03/02/83	6/01	6/29
Klein M.	6/23/83		
Klingman, K.	12/16/82		
Kolbye, A.C.	06/06/83	07/09/84	

Deposer	Date of Deposition	Date Rcd from DOJ	Date Rtd to DOJ
Koster, W.R.	1/27/84	07/09/84	
Kratz, W.G.	10/20/83	07/09/84	
Lambiotte, D.G.	02/24/84	5/04	6/28
Lambiotte, D.G.	02/25/84	5/04	6/25
Lawton, G.	02/25/83	6/01	7/19
Lawton, G.M.	8/05/83	07/09/84	
Lawton, G.M.	4/07/83	07/09/84	
Lawton, G.M.	1/27/83	07/09/84	
Leary, J.S.	01/11/83	5/09	6/22
Lee, D.H.K.	1/18/83		
Lee, D.H.K.	1/30/84		
Leasure, J.K.	12/13/83	4/30	6/12
Leng, M.	10/26/83	5/07	6/21
Lewis, J.	08/24/83	5/09	7/06
Lindsey, D.	07/06/83	5/09	7/11
Luecke, C.L.	3/23/84	07/09/84	
MacDonald, G.J.	04/22/83	5/09	6/29
Magnuson, H.J.	17/12/83	5/09	6/28
Marrese, R.J.	12/13/83	4/30	6/29
Maskill, R.E.	11/17/83	5/07	7/17
Mason, J.	01/10/84	5/03	6/27
Maurey, L.G.	02/09/84	5/09	5/23
McCarville, W.J.	02/11/83	5/09	6/29
McCreesh, A.H.	8/22/83		
McFarland, H.N.	6/29/83		
McCollister, D.	12/14/83	5/09	6/29

Deposer	Date of Deposition	Date Rcd from DOJ	Date Rtd to DOJ
McCollister, D.D.	3/30/83	07/09/84	
McDonald, G.	06/06/83	6/01	7/19
McElroy, W.D.	07/13/83	5/09	7/11
McNamara, R.S.	12/16/83	5/09	6/29
McRae, V.	04/01/83	5/09	6/21
Melvin, W.	02/15/83	6/01	7/27
Metcalf, E.	10/05/82	6/01	7/11
Miller, L.	11/09/82	6/01	7/06
Minarik, C.	07/27/82	6/01	7/12
Minarik, C.	07/28/82	6/08	7/13
Minarik, C.	07/29/82	6/01	7/11
Mitchell, I.A.	07/01/83	5/09	6/22
Morthland R.W.	2/23/83		
Mukerjee, D.	13/08/84	6/05	6/29
Mukerjee, D.	03/09/84	6/05	6/29
Nummy, W.R.	10/28/83	5/07	6/29
Ognibene, A.J.	03/22/84	4/30	6/29
Ognibene, A.J.	03/23/84	4/30	7/11
Oleary, J.F.	7/21/83		
Olenchuk, P.G.	(requested, not received)		
Oliver, N.E.	8/24/83		
Orris, P.	03/26/84	4/30	5/29
Osheroff, B.J.	01/18/83	5/09	7/02
Parks L.A.	08/31/83	5/09	6/22
Peterson, J.E.	10/17/83	5/07	6/27
Petrucelli, L.M.	1/12/83		

Deposer	Date of Deposition	Date Rcd from DOJ	Date Rtd to DOJ
Poland, A.	03/02/83	6/01	7/19
Possick, P.A.	1/3/83		
Purdy, D.M.	01/05/84	5/03	6/28
Rabstein, M.M.	3/23/83	07/09/84	
Rechtin, E.	08/30/83	5/07	6/19
Reynard, K.A.	2/25/83	07/09/84	
Rhodes, V.	12/17/84	5/09	6/12
Ringenberg. M	12/01/82	5/09	6/25
Robison, V.B.	10/19/83	07/09/84	
Rowe, V.K.	03/16/83	5/03	7/06
Rowe, V.K.	03/21/84	5/03	7/11
Rumer, R.R.	11/18/83	5/09	7/12
Russell, C.H.	15/02/83	5/09	6/22
Ryan, M.A.	03/05/84	5/04	7/17
Ryan, M.A.	04/04/84	5/07	7/11
Ryan, M.F.	02/23/84	6/01	7/27
Ryan, M.F.	03/06/84	5/03	7/11
Sass S.	2/28/84	07/09/84	
Schambra, W.P.	11/16/83	5/09	7/12
Schlesinger, A.J.	03/01/83	5/09	7/02
Schwetz, B.	01/17/84	4/30	5/10
Scott, R.B.	02/10/84	4/30	5/31
Shade, R.A.	3/17/83	07/09/84	
Sharp, D.B.	10/20/83	4/30	5/31
Shaw, W.C.	09/09/82	5/03	6/29
Shaw, W.C.	08/17/82	5/03	7/11

Deposer	Date of Deposition	Date Rcd from DOJ	Date Rtd to DOJ
Shead, C.G.	09/30/82	6/01	7/11
Sidwell, A.E.	03/06/84	5/03	6/01
Sidwell, A.E.	03/07/84	5/03	6/01
Silbergeld, E.K.	03/19/84	4/30	7/06
Silver, S.	4/14/83	07/09/84	
Silverstein, L.	03/02/84	5/03	7/19
Sim, V.M.	07/19/82	5/09	6/29
Simmons, T.C.	08/30/83	6/01	7/19
Sinclitico, A.	12/09/83	5/09	7/02
Smeraldi, J.G.	08/17/83	5/03	5/23
Smith, T.K.	4/12/84	07/09/84	
Spencer, H.C.	10/21/83	5/07	6/22
Speziale, A.J.	10/26/83	4/30	5/29
Springgate, J.E.	10/27/83	4/30	6/21
Stanwix-Hay, A.	03/08/84	6/01	7/13
Steinberg, M.	8/16/83	07/09/84	
Stephens, J.A.	10/17/83	4/30	5/31
Steward, F.G.	10/19/83	5/09	7/12
Stewart, C.E.	8/17/83	07/09/84	
Stone, W.W.	10/26/82	4/30	6/29
Strum, J.C.	12/16/83	5/09	6/27
Sultan, W.E.	9/15/82	07/09/84	
Summerson, W.H.	3/22/83	07/09/84	
Sunderland, W.W.	11/02/83	4/30	5/10
Sweet, D.W.	07/06/83	5/09	7/11

Deposer	Date of Deposition	Date Rcd from DOJ	Date Rtd to DOJ
Szabo, S.S	6/03/83	07/09/84	
Taves, M.	12/08/84	5/09	6/27
Taylor, M.	04/27/83	5/09	6/29
Thompson, W.	02/24/84	5/09	7/17
Thompson, W.	03/24/83	6/01	7/02
Thompson, W.T.	9/16/83		
Townes, C.H.	11/07/83	5/09	6/25
Traub, J.L.	2/04/83	07/09/84	
Treglia, T.A.	01/24/83	5/09	6/29
Treisback, A.L.	3/30/84	07/09/84	
Udell, W.R.	5/04/83	07/09/84	
Upholt, W.	8/4/82		
Upton, E.T.	4/07/83	07/09/84	
Upton, E.T.	4/08/83	07/09/84	
Vanderventer, E.W.	(ordered but not yet received)		
Vargas, F.	09/16/83	4/30	6/12
Verhulst, H.L.	8/19/83		
Vocci, F.J.	11/03/82	5/09	7/17
Ward D.M.	8/19/83		
Warnke, P.	12/09/82	6/01	7/12
Warren, H.	04/10/84	5/03	6/19
Webber, R.T.	10/31/83	4/30	6/28
Weimer, J.T.	08/18/83	6/01	6/25
Weisner, J.B.	10/06/83	5/07	6/19
Wells, R.F.	3/22/84	07/09/84	
Westheimer, F.H.	09/08/83	5/07	6/12

Deponent	Date of Deposition	Date Rcd from DOJ	Date Rtd to DOJ
Westmoreland, W.C.	03/03/83	6/01	7/12
Wheeler, E.P.	11/03/82	5/09	7/02
Whittam, D.	2/08/83	07/09/84	
Wilkenfeld, J.	3/25/83	07/09/84	
Wills, J.H.	4/12/83	07/09/84	
Wiltse, M.G.	12/02/83	5/09	6/25
York, H.F.	08/03/83	4/30	6/19
Young, A.L.	4/13/84	07/09/84	
Young, A.L.	4/20/84	07/09/84	
Zielinski, W.L.	8/03/83	07/09/84	
Zorsch, C.P.	05/03/83	5/09	6/29

(TOTAL) 350

Document No.: S
File Title:

COPY:
Attorney:
Exhibit No.

ISSUE SHEET FOR AGENT ORANGE INFORMATION

Batch _____ Roll _____ Reviewer: _____

Supplying Agency & Office: _____

Author & Organization: _____

Recipient & Organization: _____

Title: _____

Date: _____

Total Pages: _____

Page Request List:

Rating	Information To Look For:
1 2 3 4 5	I. Federal Tort Claims Act Defenses (GLW):
1 2 3 4 5	A. Feres Doctrine All injuries arose out of or were incident to military service.
1 2 3 4 5	1. Soldiers came in contact with Agent Orange while on active duty in Vietnam:
1 2 3 4 5	2. Ranch Hand and other defoliation teams only came in contact with AO while spraying in Vietnam:
1 2 3 4 5	3. Persons involved in procurement, shipping, storage or loading were soldiers on active duty.
1 2 3 4 5	B. Combatant Activities: The program was combat support. The decisions or actions which are alleged to be negligent were taken as part of combat operations of the armed forces or any harm that resulted occurred during combat operations (i.e., Vietnam).
1 2 3 4 5	C. Foreign Country: All injury (exposure) ocurred in Vietnam, Laos, or Cambodia, or in other foreign countries where testing was being done. All decisions were made in Vietnam:
1 2 3 4 5	D. Discretionary Function: The alleged negligent acts or omissions resulted from the decisions that were made at the descretion of the decision maker. Look for weighing and balancing of ANY factors in decisions, ANY decisions.
1 2 3 4 5	1. Most decisions were made at high levels:
1 2 3 4 5	2. Decisions were made following weighing of benefits of using the defoliants against the risks of using the defoliants:

Rating	Information To Look For:
1 2 3 4 5	3. Decisions regarding deployment of defoliants in Vietnam (specific missions, etc.) followed weighing of factors: _____
1 2 3 4 5	4. Decisions on instructions to users or combat troops, use of safety equipment, etc, were made after considering the combat situation. _____
1 2 3 4 5	II. Exposure To Agent Orange In Vietnam Did Not Cause Plaintiff's Injuries (POC; LT): _____
1 2 3 4 5	A. The type and amount of the plaintiffs' exposure to A.O. in Vietnam could not cause harm: _____
1 2 3 4 5	1. Type of Exposure: _____
1 2 3 4 5	2. Duration of Exposure: _____
1 2 3 4 5	3. Level of Dioxin to which soldiers were exposed: _____
1 2 3 4 5	4. Alternative Substances to which soldiers may have been exposed: _____
1 2 3 4 5	5. Medical Problems in Vietnam (e.g., skin diseases): _____
1 2 3 4 5	B. Dioxin does not cause birth defects in children and miscarriages in wives of men exposed: _____
1 2 3 4 5	III. The United States was not negligent in its testing, selection, specifications for or deployment of A.O. (we were reasonable) (AM; JMS): _____
	A. The Military chose a reasonable means to achieve an important end (saving U.S. lives): _____
1 2 3 4 5	1. Defoliants served a vital combat role: _____
1 2 3 4 5	a. Decreased risk of ambush: _____
1 2 3 4 5	b. Enabled to track enemy troop movements: _____
1 2 3 4 5	c. Deprived enemy of food sources: _____
1 2 3 4 5	d. Frightened enemy: _____
1 2 3 4 5	2. Military did not become aware of significant health or ecological issues until the late 1960's: _____
1 2 3 4 5	a. Military believed AO was non-toxic to users or persons accidentally sprayed: _____
1 2 3 4 5	b. Military believed AO had only minor occupational health hazards to manufacturing employees: _____
1 2 3 4 5	c. Military was not aware of presence of dioxin in AO: _____
1 2 3 4 5	d. Military did not have technical ability to detect dioxin in AO: _____
1 2 3 4 5	3. Program was periodically reviewed for effectiveness: _____

Rating	Information To Look For:
1 2 3 4 5	B. Military chose defoliants carefully to meet their performance needs: _____
1 2 3 4 5	1. Military relied upon chemical companies: _____
1 2 3 4 5	a. Military stated the purpose of the program and sought recommendation for safe, effective defoliants: _____
1 2 3 4 5	b. Chemical companies gave advice on defoliants and gave proposed specifications: _____
1 2 3 4 5	c. Chemical companies participated in military testing of suggested defoliants in Panama, Puerto Rico, Thailand, Florida and Hawaii: _____
1 2 3 4 5	2. Military sought available, safe, commercial defoliants: _____
1 2 3 4 5	a. Defoliants chosen widely used, safe, commercial products: _____
1 2 3 4 5	b. Concentrations and spray rates used were necessary to defoliate triple-tiered jungle canopy; believed safe at that level: _____
1 2 3 4 5	c. Chemical companies were aware of intended use and concentrations and spray rates: _____
1 2 3 4 5	3. Military started building AO plant at Weldon Springs: _____ _____
1 2 3 4 5	4. Defoliants were effective. _____
1 2 3 4 5	C. Manner of using the defoliants was reasonable given the combat situation: _____
1 2 3 4 5	1. Manner of labelling: _____
1 2 3 4 5	2. Manner of drumming, shipping and storage: _____
1 2 3 4 5	3. Ranch Hand (Air Force aerial spray missions) operated in a reasonably safe manner given the program's goals and environment: _____
1 2 3 4 5	a. Many factors considered at many levels in selecting spray sites: _____
1 2 3 4 5	b. All Ranch Hand personnel received adequate instruction on spraying and safety precautions: _____
1 2 3 4 5	c. Failure to follow those instructions resulted solely from the combat situation: _____
1 2 3 4 5	d. Every attempt made to minimize risk of spraying infantry troops: _____
1 2 3 4 5	e. Spray planes often under attack: _____
1 2 3 4 5	f. Aerial spraying was highly accurate: _____
1 2 3 4 5	g. Ranch Hand used good equipment: _____

Rating	Information To Look For:
1 2 3 4 5	4. Ground forces using defoliants did so in a reasonable manner: _____
1 2 3 4 5	a. Spray personnel received adequate instruction on how to spray defoliants safely: _____
1 2 3 4 5	b. Sprayed in manner minimizing contact with non-spraying personnel in spray area: _____
1 2 3 4 5	c. Failure to follow precautions: _____
1 2 3 4 5	d. Army stored defoliants properly: _____
1 2 3 4 5	5. All naval defoliation operations were conducted in a safe and reasonable manner (note <u>any</u> references to such operations by the navy here): _____
1 2 3 4 5	6. No health problems related to spray reported by ANYONE: _____
1 2 3 4 5	D. Decision to phase down defoliant program: _____
1 2 3 4 5	IV. Contract Issues (RCL): _____
1 2 3 4 5	A. Negotiating Process (note all documents that indicate U.S. issued performance bids, companies provided draft specifications): _____
1 2 3 4 5	1. Companies represented that chosen defoliants were safe: _____
1 2 3 4 5	2. Companies contracted voluntarily: _____
1 2 3 4 5	B. Contract Terms: _____
1 2 3 4 5	1. Manufacturing process: _____
1 2 3 4 5	2. Reimbursable costs: _____
1 2 3 4 5	3. Indemnification clauses: _____
1 2 3 4 5	4. Labelling restrictions: _____
1 2 3 4 5	5. Impurities (note anything that indicates what the 2% impurities permitted in the defoliant were understood to be): _____
1 2 3 4 5	6. Chemical companies warranted their product against any defects: _____
1 2 3 4 5	C. Satisfaction of Contract
1 2 3 4 5	1. Meeting specifications (note anything that indicates what "meeting specifications" was intended to mean): _____
1 2 3 4 5	2. Rejection of shipments (note any time a shipment was rejected or the reasons the U.S. would reject shipments): _____
	3. Price and profits: _____
1 2 3 4 5	V. Other/Miscellaneous/F.Y.I. (explain) _____

6-11-84

PROCEDURES FOR DOCUMENT REVIEWERS

1. Read document and circle all issues on the list to which the document pertains. Be sure that you look for information that either supports or does not support the issue. For example, on causation you should identify all studies that relate to whether dioxin can cause birth defects, whether they support the U.S.' case (no causation) or they support the contrary position (causation). Above all, remember that you are looking for factual matter relating to the issue -- not statements of the issue reflected in documents. For example, don't expect to find a document that states "Military relied on chemical companies." Instead, you will see things such as documents written to chemical companies asking for assistance in solving the defoliation problem or thanking them for their suggestions.

2. Circle the heading letter or number on the outline for the issue to which you believe particular information pertains. If you are not sure just what information would relate to a particular heading, look at the Explanation Manual under that particular heading. It will give you a short explanation of what we are looking for, the type of facts that would fit within that heading and examples. We cannot stress how important it is that you have an understanding of the facts that we think would fit within a particular category.

3. Do not limit yourself to the narrow categories that subdivide major issues. Where a document seems to pertain to an issue but does not fit within a specific heading, circle the general heading in which it fits. We would rather be cautious and make certain that the attorneys see everything that might be of assistance or that must be countered. Circle every issue to which the document's information seems to apply; many documents will apply to numerous issues.

4 DO NOT ATTEMPT TO EVALUATE THE STRENGTH OF THE DOCUMENT BY CIRCLING THE RATING NUMBERS AT THE LEFTHAND MARGIN. That will be done by the attorneys.

5. When you circle a heading, on the blank line following the heading note every page in the document which pertains to that heading. If the document is on microfilm, note the frame number instead of the document page number.

6. Fill in all blanks on the issue sheet that describe the document (e.g., title, microfilm roll and batch, author, etc.) where the document was obtained, and any exhibit numbers that are on the document. In addition, be sure to put your initials in the reviewer portion of the sheet.

7. Return document and completed issue sheet to Frances or the secretary handling the document retention for processing.

PROCEDURES FOR DOCUMENT CONTROLLERS

1. Once a document has been reviewed and the issue sheet for that document filled out, it will be returned to Frances or the secretary in charge of document retention at Shoreham. That person will log the document and place it with other documents that are to be forwarded to Safeway for attorney review and valuation. Twice a day (unless not enough documents have been reviewed to merit bringing them to Safeway), the documents with issue sheets attached will be brought by hand to Safeway. The entire document should be forwarded.

2. In addition, approximately one out of every twenty documents that have been reviewed and found irrelevant should be forwarded to Safeway as a precautionary check.

3. At Safeway, the documents should be delivered to Mike Fawcett, Room 856. Mike will have an "In" box in his office in which to leave the documents. Mike will log the delivered documents. He will then separate the documents (with issue sheets still attached) into piles, sorting the documents according to the issues circled (i.e., if five FTCA Defense issues are circled and no other category has that many circled, he will put that document in the FTCA Defense pile). Once the documents are sorted, he will bring that pile of documents to the attorney (or attorneys) who have responsibility for that issue. Each of those attorneys will have an "In" box in his or her office in which Mike can leave the documents. Mike will note when he delivered the documents and to which attorney he delivered them.

4. For those documents without issue sheets (the random sampling of irrelevant documents), Mike will divide their review responsibility equally among the trial attorneys.

5. Within 24 hours, the attorney will review the document and place values on the strength of the document by circling the valuation numbers at the left hand margin for each issue the document supports or does not support. Following that review, the attorney will return the document to Mike for processing. Mike will have a "Returned by Attorney" box in his office for this purpose.

6. If the attorney has checked the "copy" box in the upper right hand corner of the issue sheet, Mike will copy the document and give the copy to the attorney for retention in that attorney's file.

7. Mike will then note in his log that the attorney returned the document. It will be Mike's responsibility to remind all attorneys of their responsibility to review documents within 24 hours of its delivery to the attorneys.

8. Mike will then forward the document to Shoreham for coding. He will have an "Out" box in his office from which a runner from Shoreham will pick up documents twice a day.

PROCEDURES FOR ATTORNEYS

1. Twice a day, Mike Fawcett will be receiving reviewed documents from Shoreham. He will log the documents in and will divide them into areas of attorney responsibility. He will do so based solely on the number of issues circled, sending the document to the attorney that has responsibility for the area with the most issues checked.

2. Read the issue sheet and the pages of the document circled for that issue. Read the rest of the document if you so desire. For each issue, value the strength or weakness of the document. The valuation system will be a plus 1 through 5 and a negative 1 through 5. Obviously, a negative 5 is "the smoking gun" and a plus 5 is the CDC Birth Defect Study if it says no causation. It will be the attorney's responsibility to put a plus or minus sign in front of the rating number that the attorney circles for each issue. You can handle it, guys.

3. Each attorney will have some form of noting the documents that he or she has reviewed for his or her personal trial prep files. It is that attorney's responsibility. In addition, if the reviewing attorney wants a copy of the document to retain for those trial files, check the "copy" box in the upper right hand corner of the issue sheet. Remember to fill in your initials so that Mike will know to whom to return the copy.

4. Other Trial Issues. As stated, the attorney reviewing a document will be doing so on the basis of numbers (your issues were checked most often). Obviously, other members of the trial team may have an interest in the document you have reviewed. As reviewer, it is your responsibility to see that that attorney (or attorneys) has access to this document. If you are having the document copied for yourself, have additional copies made (one for each attorney that you think should see the document); note in the copy box how many copies should be made and to whom they should go. Mike will handle the rest. If the attorney for whom you have had the copy made doesn't want it, he or she can get rid of it. If you are not having a copy of the document made, route the document to the next attorney that you think should see it. That attorney will review the document and decide if he or she wants a copy made.

5. REMEMBER YOU SHOULD REVIEW DOCUMENTS WITHIN 24 HOURS OF THEIR DELIVERY TO YOUR "IN" BOX. Please adhere to this deadline. Only with prompt review can we get these documents coded for the computer in time to make use of them for trial. Mike has full authority to bug attorneys.

6. In addition, each attorney will have responsibility to share in the review of the sampling of documents rejected by Shoreham as irrelevant. Mike will be dividing the sample documents between the attorneys. Review to see if you agree that the document is irrelevant. If so, just give it back to Mike. If not, fill out an issue sheet by yourself and send it back to Shoreham via Mike.

EXPLANATION MANUAL

DOCUMENT IDENTIFYING INFORMATION:

1. DOCUMENT NO.: This is the number that the document has been assigned by the Shoreham project.

2. MICROFILM ROLL & BATCH NO.: This will apply to documents previously produced by the United States and placed on microfilm. The JUS roll number and the batch no. will be visible along the righthand margin on each page of the document.

3. REVIEWER: The person filling out the issue sheet for a particular document should always put his or her initials in this blank.

4. FILE TITLE: This is the title of the file in which the document will be retained at Shoreham.

5. FILE DRAWER NO.: This is the place where the document will be filed once the review process is complete.

6. EXHIBIT NO.: This applies only if the document has come from either the plaintiffs' or the defendants' pretrial orders. In the upper righthand corner of the first page of the document, the party proffering the document will have placed an Exhibit Label with a number on it. Write that number in this blank on the issue sheet. It will help the attorneys know whether or not to expect that document to be offered against the U.S.

7. SUPPLYING AGENCY AND OFFICE: If this document has come from a government agency, the attorneys should know which one. It is important for authentication purposes and for evidentiary purposes that we be able to track the document. For example, many of our documents can probably come into evidence under the ancient documents exception to the hearsay rule. However, to make use of that rule, we need to know whether it was discovered in a place where such a document would reasonably be expected to be found. Thus, we must get as much information about the document's location as possible. So don't just put down "Army", put down "Industrial Liaison Office, Edgewood Arsenal".

DOCUMENT INFORMATION (ORIGIN):

1. AUTHOR AND ORGANIZATION: Fill in the name of the author, if at all possible. Equally as important is the author's organizational identification. If it is not clear in detail, at the very least put down "Army" or "Government" or "Dow Employee". But try to get detail where possible.

2. RECIPIENT AND ORGANIZATION: If correspondence, put down the addressee. If it is a report, check the introduction to see if the report was prepared for anyone or at someone's request. Be creative in figuring it out if it is not clear. ~~In addition, note all persons who were to receive copies of the document or to whom copies were allegedly circulated.~~ Just as was the case for the author, the organizational information can be crucial. Follow the directions for 1., supra.

3. TITLE: If it is a report, etc., it will have a title. If it is correspondence, identify it as a letter and use the "re" as the title. If there is no official title, but it is clear what the document is, indicate that here.

4. DATE: Use years or approximates if the date is not clear. You may be able to tell from the document's text.

5. TOTAL NO. OF PAGES: Count the number of pages in the document and fill in here. Indicate whether the document is complete, incomplete, missing attachments indicated in the body of the text, etc.

ISSUE OUTLINE:

I. FEDERAL TORT CLAIMS ACT DEFENSES (GLW): This is the Act under which the chemical companies have sued the United States. The Act constitutes a limited waiver of the United States' immunity from suit as the sovereign. Under the Act, the United States can be sued for civil wrongs (personal injury, property damage) for which a private individual also could be liable. However, there are a number of exceptions in the Act, which means that the United States has not waived its sovereign immunity for harm caused by such excepted acts or omissions. If any act or omission for which a party brings suit is one of the exceptions, then no court can have jurisdiction over the suit. A number of these exceptions bar the Agent Orange suit.

A. FERES DOCTRINE. This is a judicially invented exception to the FTCA, which the Supreme Court derived by interpreting the Act and the intent of Congress. The Feres Doctrine holds that the United States cannot be subject to suit for injuries to soldiers arising out of or occurring incident to the soldiers' military service. The doctrine's primary purpose is to protect military discipline by preventing intra-military suits and disallowing second-guessing of military orders. This is a very important doctrine for the United States.

We have been successful in knocking out any suits in AO brought by veterans or brought by the chemical companies for indemnity based on the veterans' suits. However, the Judge has held that the United States can be brought to trial in suits brought by wives of veterans for miscarriages and by children of veterans for birth anomalies. The U.S. contends that these suits derive in their entirety from injury to servicemen arising out of or incident to their military service in Vietnam (chromosomal damage, if any damage, to servicemen following exposure to AO in Vietnam). Thus, we must prove that all injuries at issue in the lawsuit arose out of or were incident to military service.

At the heart of what we must prove is that the only place the veterans were exposed to Agent Orange is while they were in Vietnam. It does not matter as much that someone may have been exposed while on leave in Vietnam, if they were serving in Vietnam, because we would contend that the only reason they were ever there was to be on active duty. Therefore, look for any and all factual data reflecting when and where people were exposed to defoliants.

1. Soldiers came in contact with Agent Orange while on active duty in Vietnam. Many examples of what we are looking for exist. DO NOT LIMIT YOURSELF TO THE EXAMPLES. Examples:

- Soldier on patrol drank water obtained from a bomb crater in a defoliated area.
- Soldier on patrol drank water from well dug in a defoliated area or downstream from a recently defoliated area.
- Soldier on patrol ate food that had been obtained from a defoliated area.
- Soldier on patrol walked through a defoliated area (often described as moonscapes).

- soldier on patrol (or in base camp, on road to camp, etc.) was accidentally sprayed by plane or helicopter.

2. Ranch Hand crews and other defoliation teams came in contact with AO while spraying in Vietnam. The Ranch Hand crews were the Air Force personnel that conducted the aerial spray missions in C-123s. Other defoliation teams include ground forces (usually Army or Marine) using backpacks or trucks to spray the perimeters of base camps to clear fields of fire, Army, Air Force, etc. helicopter crews spraying a variety of areas and naval personnel spraying river banks from boats. Examples:

- Army private spraying from backpack accidentally sprayed another soldier at a base camp.
- Soldier out at a listening post was sitting in a recently defoliated area.
- Naval patrol boat engaged in spraying river banks got caught in cross winds and the spray blew back, soaking the personnel.
- Ranch Hand crews flying with windows open (either because of heat or to prevent shattering glass if hit by unfriendly fire while flying at low altitude) got soaked during spray because updrafts blew the spray in the open windows.

3. Persons involved in procurement, shipping, storage or loading were soldiers on active duty. This covers all military personnel who may have been exposed to AO, but who may not have been in Vietnam when exposed. It also covers Ranch Hand ground crews who loaded the planes. Examples:

- Sailor loading ship at Gulfport, Miss., for transport of AO to Vietnam. A drum he is loading leaks and spills on him.
- Soldier unloading truck at storage area drops drum, which splits and splashes AO on him.
- Soldier inspecting storage area walks on ground where AO has recently seeped out of leaking drums.
- Ranch Hand ground crew loading plane gets soaked while pumping AO into the spray tanks.

B. COMBATANT ACTIVITIES: This is an exception that bars suit for all injury (personal or property) arising out of the combatant activities of the armed forces. There is very little caselaw interpreting this exception. But the caselaw seems to make it clear that the exception is not limited to actual battlefield injuries caused by battlefield decisions (this is the Judge's interpretation of the exception). He focusses on the negligent act; we focus on the injury. The little caselaw that does exist indicates that harm caused by acts or omissions made IN SUPPORT OF ACTUAL COMBAT constitutes harm barred from suit by the combatant activities exception.

We must set up the factual basis to prove (probably to an appellate court) that any injuries in the lawsuit arose out of combatant activities, e.g., the Vietnam War. It is a fairly simple, but important defense. Look for anything that supports our contention that the only exposures were in Vietnam while there for combat activities (not necessarily just soldiers out on patrol). We contend that anyone in the military who was in Vietnam was there as part of a combat action and a combat force.

It will help you if you always remember that the defoliation program, particularly Ranch Hand, was classified as a combat support program. Therefore, it seems somewhat obvious that anyone who came in contact with AO via the Ranch Hand program

the Judge's interpretation is correct, the pertinent "negligent" acts leading to exposure were made as part of or in support of combat decisions. Look for factual material that shows that Ranch Hand and other defoliation activities were an integral part of combat operations. DO NOT LIMIT YOURSELF TO THE EXAMPLES. Be creative and note anything that you think reflects the combat support role of the program or that soldiers were exposed while in combat. Examples:

- Fighter planes accompanied spray planes to protect them by clearing out enemy in spray areas.
- Ranch Hand planes shot at or down by unfriendly fire.
- Decision to defoliate at certain coordinates made because a number of patrols have been ambushed in that area.
- Patrol sent out on patrol to intercept enemy goes through a defoliated area.
- Document reflecting number of wounded Ranch Hand personnel.
- Backpack spray personnel wounded while spraying (sniper, booby trap, etc.).
- Decision to clear around base camp perimeters with defoliants made as part of standard military procedure clearing fields of fire to prevent enemy from having cover on approach to base camp.
- Helicopters spraying defoliants were armed.

C. FOREIGN COUNTRY: This exception to the FTCA prevents a suit arising in a foreign country. The reason the exception exists is that, under the FTCA, the law that is applied in judging a suit is the law of the place where the cause of action arose. Congress did not want the United States' actions to be judged under the law of foreign countries. Therefore, it barred all suits arising in foreign countries. For example, a serviceman's dependent in Germany who suffers injury due to alleged medical malpractice by a military doctor cannot sue the United States because the standard by which the doctor's actions must be judged is the standard of care to which a German doctor would be held.

We contend that this suit is one arising in a foreign country because all the soldiers were exposed in Vietnam (or neighboring countries) and all injury (chromosomal, genetic, etc.) occurred in Vietnam (or neighboring countries). The Judge has indicated that he disagrees with us; he believes that the negligent acts must have occurred in Vietnam and that the decisions to select AO and to defoliate with it was made in the United States (we don't necessarily mind this as it sets up the discretionary function exception). We contend, however, that the pertinent "negligent" acts that resulted in the soldiers' exposure were the decisions to defoliate the particular areas in which the soldiers were exposed. These decisions were made in Vietnam. Other pertinent decisions may have been the development of procedures to handle defoliants (alteration of standard procedures because of the particular situation that arose in Vietnam).

In addition, the military did testing of AO and other defoliants at issue in the lawsuit in suitable foreign countries (ones with jungle). Be sure to note documents that reflect that testing to the extent they indicate some exposures may have occurred there or that decisions as to which defoliants to use may have been made there. The countries to look for are Thailand, Panama and (maybe) Korea.

Examples:

- Document reflecting the decisionmaking process for defoliation site selection.
- Soldier exposed while on patrol in Vietnam (ate food from defoliated area, etc.)
- Soldier exposed by drinking water given to him by Vietnamese (Vietnamese stored water in former AO drum sold to him by ARVN).
- Decision to defoliate base camp perimeter despite the presence of troops in the area.
- Decision to send patrol out into area just after (before or during) spray mission.
- Sailor exposed while unloading ship in Vietnam.

D. DISCRETIONARY FUNCTION: This exception immunizes the United States from liability for any harm "based upon the exercise or performance or the failure to exercise or perform a discretionary function or duty on the part of a federal agency or an employee of the Government, whether or not the discretion involved be abused." 28 U.S.C. §2680(a). This is a very important exception for the United States, but unfortunately is very fact-dependent.

The U.S. contends that almost any decision by almost any employee of the Government can potentially fit within this discretionary exception. Some caselaw holds that "operational" decisions do not fit within this category. An operational decision is one that implements a policy decision. The U.S. says that even so-called operational decisions can be within the discretionary function exception if the decisionmaker have latitude in deciding how to implement or whether to implement. This is an issue of choice, i.e., did a person making a decision have any latitude?

Look for weighing and balancing of ANY factors in decisions, ANY decisions. It is pretty well accepted that if a decision involved risk-benefit analysis, it is discretionary. At the Executive Branch level (White House, Secretary of Defense, upper level decision-makers), look for weighing of policy interests, program goals, program costs, executive department duties, political and international considerations, etc. At the regional or local level (local commanders, head of Ranch Hand, etc.), look for weighing of tactical, logistical, practical considerations.

The subcategories listed after the main title in this section are by no means all inclusive. They consist of a few of the main type of decisions we are looking for. If you find something that looks like it might fit into a definition of a discretionary act, note it under the main heading.

1. Most decisions were made at high levels. So long as a high-level decision or action is not mandatory under law, it is likely to be discretionary. The U.S. contends that the choice of this materiel for use in furtherance of military goals and the decision to use that military is entirely discretionary with the Executive Branch (if not barred by law). Look for any documents that indicate that high level types had a hand in these decisions. Examples:

- Kennedy made the decision to allow defoliation missions to go forward.
- The Director, Defense Research & Engineering, DoD, decided to select Agent Orange as the defoliant of choice.

- Kennedy gave final approval to defoliation missions in the early days of Ranch Hand.
- Deputy Secretaries Committee (Executive Level) reviewed the effectiveness of the defoliation program.
- McNamara gave continued approval to the defoliation program.

2. Decisions were made following weighing of benefits of using the the defoliants against the risks of using the defoliants. This area is important to show that the persons in charge of Ranch Hand went through a risk/benefit analysis or that they had reports reflecting such risk/benefit analysis available to them while making decisions about the program. You will probably not find a document that indicates this is what is going on; instead, you will find a document listing a wide variety of factors about the defoliation program. Among the factors to look for (note any documents that indicate any of these factors) are: cost of the program, goals of the program (saving lives through clearing out ambush areas, tracking troops movements, psychologically intimidating the enemy and depriving the enemy of food sources), risks of the program (charges of chemical warfare, toxic hazards to users or persons accidentally exposed, non-effectiveness of the program, risk to planes and plane crews, etc.) and logistical problems. These things go to the decision to defoliate, the choice of defoliants, and the decision to continue the program. Examples include:

- the Rand Report (evaluation of the program - risks versus benefits.
- Memorandum to JFK seeking approval of program.
- Document reflecting choices of various herbicides for use in the program.
- Report to Westmoreland, Abrams or McNamara regarding effectiveness of program.
- Review of Ft. Detrick or Edgewood Arsenal personnel following testing of particular defoliants or observations of program in Vietnam.

3. Decisions regarding deployment of defoliants in Vietnam (specific missions, etc.) followed weighing of factors. This brings the discretionary activity down to the local level where defendants will claim that no discretion occurred in that these were operational activities. We claim to the contrary. Every decision to defoliate went through an elaborate chain of command in which a wide variety of factors were considered, including feasibility, presence of troops, and the need to defoliate that area. We need to find documents that reflect this fact. Examples:

- Document denying request of province chief (all Ranch Hand requests apparently originated with them) to defoliate crops in a certain area because it was not clear that crops belonged to unfriendly villagers, or to defoliate particular areas of jungle because American troops were operating in the area.
- Document reflecting decision not to defoliate particular area because of significant native population or area too dangerous for low altitude flight.
- Document reflecting decision to fly mission several days later than planned because fighter escort was unavailable or because weather would not permit effective spraying.
- Decision to allow spray mission to go forward despite presence of U.S. troops made because monsoon season was about to start (prevented all spray missions) and it was imperative to safety of troops in the area to defoliate (known enemy ambush area).

4. Decisions on instructions to users or combat troops, use of safety equipment, etc. were made after considering the combat situation. This is a way to prevent us from getting tripped up on the failure to follow "adequate" safety precautions. Remember the acts can be negligent as long as they are discretionary. Again, we are always looking for weighing and balancing. Examples:

- Decision not to require spray personnel to wear gas masks because in jungle heat they would suffer heat stroke or because personnel could not see adequately to be aware of or prevent ambush.
- Decision not to prevent Ranch Hand personnel from leaving windows open during spray (and thus getting soaked with AO) made after considering that closed windows hit by bullets often shatter and glass splinters can blind pilots.
- Decision to put water facility in the middle of defoliated area made after considering that it was better protected from ambush (it was safer).
- Decision by officer to allow soldiers under his command to drink water from craters in defoliated area (despite regulations prohibiting) made after considering that it was better not to lose soldiers to dehydration when no other water sources were available.

II. EXPOSURE TO AGENT ORANGE IN VIETNAM DID NOT CAUSE PLAINTIFFS' INJURIES (POC, LT): This is the causation element of the case. The United States' position will be either that it still cannot be proven that the exposure to Agent Orange caused the alleged injuries (i.e., the jury is still out) or that exposure to to Agent Orange did not cause the injuries.

A. The type and amount of the plaintiffs' exposure to A.O. in Vietnam could not cause harm: Causation of injuries by exposure to toxic substances is very dose response specific, i.e., whether a substance can cause harm depends upon the concentration or amount of the substance to which a person is exposed and the duration of the exposure. In this section, you should note any and all documents that reflect facts about exposures.

1. Type of Exposure. Under this heading, you should note all documents indicating the route of exposure. Thus, you would put all documents here that contain statements reflecting examples of the following (REMEMBER THESE EXAMPLES ARE NOT ALL INCLUSIVE):

- soldiers drinking water from craters or streams in defoliated areas.
- soldiers walking through defoliated areas.
- soldiers eating local food in areas of defoliation.
- soldiers being sprayed while out on patrol.
- personnel loading Ranch Hand planes spilling AO on themselves or others.
- storage area personnel being spilled on while loading drums for transport to Ranch Hand planes.
- backpack spray personnel spilling AO while opening drums for filling backpacks.
- Ranch Hand flight crews soaked in AO while spraying due to updrafts.

2. Duration of Exposure: The duration of the exposure is also very important in determining causation. Here you are looking for information that will give us an indication of the length or frequency of a person's exposure. Examples:

- soldier out on patrol for three weeks after walking through recently defoliated area and getting uniform soaked with AO (no change of uniform and no opportunity to wash uniform.
- soldier sprayed with AO while out on patrol was not able to wash spray off.
- soldier walked through defoliated areas for days.
- Ranch Hand pilot able to take shower and change uniform after getting soaked by AO during spray mission.
- soldier wearing backpack sprayer whose backpack leaked all over his uniform was unable to change uniform.
- anything reflecting how close soldiers were to defoliated areas and how soon they were there following the spray mission.

3. Level of dioxin to which soldiers were exposed: This relates entirely to how much dioxin was in the Agent Orange we used and with how much of that dioxin did soldiers ever come in contact. Note all documents that reflect information such as the following (REMEMBER THE EXAMPLES ARE NOT ALL INCLUSIVE):

- dioxin is degradable in sunlight.
- jungle canopies prevented AO from penetrating to ground level where the soldiers were.
- anything reflecting the levels of dioxin that was in the AO used in Vietnam.
- 2,4-D did not contain dioxin; therefore, in a 50:50 mix of D and 2,4,5-T (which contained dioxin), the amount of dioxin in AO was halved.
- dioxin molecules are heavier than water molecules, therefore, water taken from the top water levels in a crater may have had less dioxin.
- dioxin molecules bind with soil.

3. Alternative substances to which soldiers may have been exposed: The military did use many other substances in Vietnam which might have been toxic. The job here is to find those substances and to show that it was those substances to which the plaintiffs were exposed. Examples to look for include:

- jet fuel
- malathion (this was sprayed from planes to kill mosquitos due to the horrendous malaria problems encountered in Vietnam). Look for descriptions of the plane spraying a substance with which a soldier was sprayed. A silver plane would have been spraying malation.
- dapsone.
- insect repellant
- malaria pills
- Agent Blue or White (other defoliants not containing dioxin).

4. Medical Problems in Vietnam (e.g., skin diseases): This is a very important area of alternative causation. Vietnam had numerous parasites, bacteria and viruses that wreaked havoc upon our combat troops. Many of the health problems that those troops now have may have resulted from diseases they had or picked up in Vietnam. A prime example is skin disease. Skin problems were rampant in Vietnam and ranged from jungle rot, tropical acne to other very serious skin problems caused by bacterium. Many soldiers with current skin problems claim that it is chloracne when, in all likelihood, it is one of these other skin problems. Thus, look for documents reflecting

any medical problems in Vietnam, medical treatment in Vietnam and discussions of diseases and health problems endemic to Vietnam and tropical climates. These documents could include

- monthly status reports by physicians in particular areas.
- studies on different diseases in Vietnam.
- descriptions of skin problems in Vietnam.
- studies on the aftereffect of having certain diseases (which were prevalent in Vietnam).

B. Dioxin does not cause birth defects in children and miscarriages in wives of men exposed: This is a general category in which you should put anything at all that supports or negates this proposition. All studies, medical articles, reports, testimony, protocols for studies, physicians' reports, correspondence between chemical companies, etc. Be sure to include ALL documents that discuss the effect of dioxin on genes, chromosomes and the immune systems even if they do not discuss miscarriages and birth defects. These injuries are completely dependent upon injury to the exposed person's genes. Therefore, any genetic injury to exposed persons is important. Be sure to include animal studies in this category. Since this is a catch-all category, be overinclusive if you are not sure.

III. THE UNITED STATES WAS NOT NEGLIGENT IN ITS TESTING, SELECTION, SPECIFICATIONS FOR OR DEPLOYMENT OF AO (WE WERE REASONABLE) (AM; JMS): This category goes to the merits of the United States' actions in deciding to have a defoliation program to support its combat efforts in Vietnam. The standard that we must prove we met (actually, that defendants have to prove that we did not meet) is the "reasonable person" standard, e.g., that a reasonable person would have done what we did under the circumstances. The last phrase is the critical one for the United States. Basically, it means that our decisions to go forward with this program were reasonable given the fact that we were in a war situation (it doesn't matter that it was undeclared).

The individual categories in this section will break out the United States' actions into discrete parts. Information pertaining to each category will assist us in showing that, despite whatever problems and deficiencies there may have been in the defoliation effort, the program was reasonable given the fact that we were in combat.

A. The military chose a reasonable means to achieve an important end (saving U.S. lives): We must find documents that reflect the importance of the goal of the defoliation program. Basically, what all commanders do is attempt to save lives today to have soldiers able to carry on the battle tomorrow. The defoliation program was one way to do that. In addition, we must show that the means chosen to carry out that program to achieve that end was reasonable considering everything (goal, what was available to accomplish that goal, etc. Note all documents that in any way reflect this type of information.

1. Defoliants served a vital combat role: This is the general heading reflecting the purposes of the defoliation program. Use this to note any documents reflecting goals other than the four listed below.

a. Decreased risk of ambush: One of the goals of the program was to decrease the risk that our troops would be ambushed out in the field. Under this heading, look for facts that show that this was one of the goals and the success of the defoliation program in meeting this goal. Examples of this are facts such as the following:

- Defoliation missions cleared away bushes and jungle underbrush in which enemy could hide.
- Number of ambushes in a previously heavy ambush area decreased following defoliation missions in the area.
- Fewer soldiers suffered casualties in defoliated areas.

b. Enabled to track enemy troop movements: One of the problems that the military faced in Vietnam was its inability to know where the enemy was infiltrating. One of the goals of the defoliation program was to remove the jungle canopy that prevented reconnaissance planes from tracking the enemy's movements. With the removal of that canopy, the military believed it would be able to track the enemy from the air. Under this heading, look for facts that show that this was one of the goals and the success of the defoliation program in meeting this goal. Examples of facts that might be pertinent to this area are the following:

- Project Pink Rose: this constituted an attempt to burn leaves that had withered on trees (from defoliation) so that the ground under the trees was visible from the air.
- Slides showing that, after defoliation, you could see movement in the jungle.
- documents showing increase in success of reconnaissance missions following defoliation missions.

c. Deprived enemy of food sources: One of the first uses of defoliants in combat situations was in Malaysia. The British used defoliants to destroy crops of Malaysian insurgents in the 1950s. This food deprivation goal was one of the goals of the defoliation program in Vietnam. However, this was a sensitive goal and crop destruction was always carefully planned and limited in scope. Look for facts showing that this was one of the goals and the success of the program in achieving the goal. Examples:

- enemy had to leave defoliated areas because crops died.
- Kennedy kept personal control on all crop destruction missions.
- Local Vietnamese villagers complained when their crops were killed.
- Enemy soldiers who have defected or been captured reported that crop destruction in their area of operation caused significant supply problems.

d. Frightened enemy: One of the effects of the spray missions was to cause psychological damage to the enemy. It doesn't appear that this was an initial goal of the program, but that, once the military realized the debilitating effect the program was having on the enemy's confidence, they took full advantage. Thus, the military often conducted psychological warfare right alongside the spray missions. Look for facts that reflect that the missions had this effect. These facts could include the following:

- enemy feared spray, believing it to be toxic.
- enemy tried to use "protective equipment" when caught underneath a spray mission.

- enemy left area following spray missions because they were afraid to eat the local food once it had been sprayed.

2. Military did not become aware of significant health or ecological issues until the late 1960s: This is a very critical area for factual development. The chemical companies will attempt to show that the U.S. was fully aware of anything the chemical companies knew. They will attempt to prove that we acquired this information independently so that it doesn't matter that they neglected to tell us. Therefore, under this heading, note anything that indicates the military's knowledge or lack of knowledge about problems associated with use of defoliants in Vietnam. The four categories that follow are probably the most important, but there will be facts reflecting this general category that do not fit in the four specific categories. Therefore, put all such facts under this general category. These types of facts could be:

- ecological damage was not expected since defoliants did not kill trees.
- military had to pay damages for accidental harm to rubber trees in local plantations.

a. Military believed AO was non-toxic to users or persons accidentally sprayed: This is self-explanatory. Example of pertinent facts follow:

- document indicating low toxicity of all defoliants being considered for use.
- no health problems incurred by users of these commercial herbicides during the many years of domestic use.
- chemical companies represented during contracting phase that the defoliants were safe.
- during the first few years of use in Vietnam, no health problems were suffered by the personnel handling the defoliants.
- Vietnamese soldiers acting as loaders of Ranch Hand planes suffered skin rashes.
- Chemical company representatives informed the President's Science Advisory Committee that the chemicals were relatively non-toxic.

b. Military believed AO had only minor occupational health hazards to manufacturing employees: In 1967, the Army decided to build its own Agent Orange manufacturing plant at Weldon Springs. During the exploration phase, a number of personnel from Edgewood Arsenal visited some chemical company plants to learn about the manufacturing process. During those visits, it seems pretty clear that they learned about the presence of dioxin in 2,4,5-T and that the chemical companies had had chloracne appear in some of their employees. Note absolutely anything that indicates the military learned about health hazards to humans during the manufacturing process. We will contend that learning about these hazards does not mean that we learned anything that would indicate that AO was harmful to end-users. However, remember not to limit yourself to Weldon Springs facts. It is possible we may have learned something during the initial contracting phases in 1963 and 1964. Facts to look for could include the following:

- correspondence from chemical companies informing the military about the chloracne hazard to manufacturing personnel.
- documents indicating that chemical company personnel had never suffered anything but chloracne.

- documents indicating that the chemical companies did not inform the U.S. that their employees had suffered liver damage.

c. Military was not aware of presence of dioxin in AO: We have every reason to believe that, until the Army started exploring the manufacturing process of AO for the Weldon Springs project, it had no idea that dioxin was an unwanted by-product in the AO manufacturing process. Note everything that supports or negates this proposition. Related facts to look for include:

- definition of impurities in the contract negotiations.
- correspondence from chemical companies which may or may not indicate that dioxin was the culprit causing chloracne in their employees.
- Dr. Hoffmann may have known about dioxin, but he didn't know that it was an impurity in defoliants.
- PSAC (President's Science Advisory Committee) knew about dioxin in AO in 1965.

d. Military did not have technical ability to detect dioxin in AO: It takes highly sophisticated equipment and processes to detect dioxin. Although the chemical companies had the ability, it was still state of the art equipment and know-how that the military did not yet have. Thus, we would contend that it would not be reasonable to expect the military to discover the presence of dioxin if the chemical companies failed to inform us. Examples:

- When the military wanted to get rid of the excess AO in the early 1970s, it had to test for dioxin. It did not have the capability, nor did any other governmental agency. They had to get outside assistance.
- Edgewood Arsenal and Ft. Detrick did not have gas-liquid chromatography equipment in the 1960s.
- Chemical companies informed Weldon Springs personnel that they had the means to detect the presence of dioxin down to 1 ppm.

4. Program was periodically reviewed for effectiveness: Because of the sensitivity to charges of chemical warfare, the United States constantly reviewed the defoliation program to make certain that its was achieving its goals and was effective. These reviews were both formal and informal. . They were conducted at all levels of the military. The Executive Office also conducted reviews and also hired outside consultants to do independent reviews. The reviews usually concluded that the program was working and that it was saving American lives. However, the military had to continually provide justification for the program. Note anything that appears to be an evaluation of the program no matter what the results of the evaluation were. Examples:

- After Action Report discussing the results of a particular defoliation mission.
- Lessons Learned discussing the outcome of a particular series of defoliation missions.
- The Rand Report reviewing the defoliation program as a whole.
- Progress reports to McNamara at his meetings in Hawaii.
- Undersecretaries Committee review of the defoliation program for Kissinger.
- President's Science Advisory Committee continually reviewed the defoliation program.

B. Military chose defoliants carefully to meet their performance needs: This entire heading goes to the issue of the United States' reasonableness in selecting the herbicides that we did for the program. Our goal in this area is to prove that we merely informed the chemical companies what we wanted to do (defoliate particular areas of Vietnam for the purposes stated in III.A, supra) and asked them to come up with products that would meet this need. The chemical companies, of course, contend that the U.S. told them exactly what to produce. That may have been true at the end when we issued specifications, but those specifications were the culmination of a long negotiating process between the military and the chemical companies. Look for any facts that might relate to this process of selecting herbicides for use in Vietnam.

1. Military relied upon chemical companies: Under this heading, note any fact that reflects dependence upon the chemical companies for the scientific know-how in the program. This could include:

- documents reflecting lack of knowledge on the part of the scientists trying to find a defoliant that would meet the need.
- correspondence from chemical company indicating willingness to meet to discuss the military's needs and how to solve the problem.
- intramilitary message reflecting knowledge just acquired from a chemical company.
- memorandum noting receipt of sample defoliants from chemical companies along with sales literature.

a. Military stated the purpose of the program and sought recommendations for safe, effective defoliants. Here we want to show that the military did not just go to the chemical companies and state that they wanted to purchase massive quantities of defoliants. We want to show that the chemical companies played an integral role in the selection of the defoliants. To that end, we want to find facts that indicate that the chemical companies knew what the program was and the use for which the defoliants were intended. Thus, look for anything that might support that proposition (also anything that negates it). Examples:

- Request for bidding issued by the military (performance bids) in which military stated what it wanted to do and requested that companies come up with suggested products that would accomplish that goal.
- Minutes of meetings between military and chemical company representatives in which the goals of the program were discussed.
- Correspondence between military and chemical company in which military personnel informed chemical company about what was wanted.

b. Chemical companies gave advice on defoliants and gave proposed specifications: In this heading, we are looking for the chemical industry's response to the military's request for assistance. We know that there was a fair amount of give and take in the negotiating process and now need the facts to prove it. Examples of information fitting within this heading are:

- correspondence from chemical companies indicating possible defoliants would meet the military's needs.
- minutes of a meeting between military and chemical companies in which the safety of certain herbicides was discussed.
- internal chemical company report discussing the concentrations needed to produce the desired effect on jungle foliage and the safety of that concentration.

d. Chemical companies participated in military testing of suggested defoliants in Panama, Puerto Rico, Thailand, Florida or Hawaii: This heading goes to the chemical companies' claim that they had no idea what we intended to do with the defoliants, particularly that they did not know how we intended to apply it. We believe that the chemical companies were right alongside the U.S. military in determining the most effective means of applying the defoliants to jungle foliage. Thus, look for anything that reflects the presence of a chemical company representative at any of the test sites used by the military. This could consist of:

- letters responding to military's invitation to participate in defoliant testing.
- reports following testing which indicates the names and affiliations of participants.
- internal chemical company reports indicating the results of tests attended by the author.

2. Military sought available, safe, commercial defoliants: We want to show that the military was not interested in inventing new defoliants for use in Vietnam. Instead, we want to show that they went to the chemical companies and asked for off the shelf products that would meet the need. Therefore, under this heading, note all documents that support or negate that proposition.

a. Defoliants chosen were widely used, safe, commercial products: One of the defendants' contentions is that they never produced Agent Orange before the military asked them to do so and that they never produced it after the military no longer required it. We contend that they may never have sold anything called "Agent Orange", but that they certainly sold 50:50 mixes of 2,4-D and 2,4,5-T, the two components of Agent Orange. Examples of information that should fit within this heading (REMEMBER THAT THE EXAMPLE FACTS MAY OR MAY NOT EXIST; THEY ARE MERELY TO GIVE YOU GUIDANCE) are:

- Commercial literature showing sale of 50:50 mix of D and T.
- T was one of the most commonly used domestic herbicides.
- T had never caused health hazards to end users.
- memorandum showing that the defoliants being considered for use were all commonly used domestic herbicides.
- Letter indicating that Dow produces 1 million pounds of T annually.

b. Concentrations and spray rates used were necessary to defoliate triple-tiered jungle canopy; believed safe at that level: This heading reflects the reality that commercial defoliants might not have been sufficiently powerful to defoliate triple-tiered jungle canopies. Therefore, the military had to devise means to make these easily-available defoliants accomplish their goals. They conducted tests to determine at what concentration and at what spray rates (3 gallons/acre; 1 gallon/acre, etc.) the defoliants would work on jungle. Also included in this heading is any information that demonstrates the belief (military) that these rates of spray were safe. Examples:

- Test results from Eglin AFB.
- Dr. Brown's report after testing in Vietnam in 1962.
- Minutes from meetings at which military personnel indicated that there would not be any increased risk by using those concentrations.

c. Chemical companies were aware of intended use, concentrations and spray rates: This heading will support the contention in the previous heading. To the extent the military believed that the concentration and spray rates were no less safe, we want to show that that belief was promoted by the chemical companies. Examples to look for:

- minutes of meeting attended by chemical company representatives in which they indicated that there would be no additional hazards if the military sprayed at the intended rates.
- internal chem. company memo. reflecting the military's intention to defoliate jungle in Vietnam.
- correspondence in which chem. company represented no health hazards if used in the manner indicated by military.

3. Military started building AO plant at Weldon Springs: Under this heading, note anything having to do with the Weldon Springs Project in which the Army decided to build its own Agent Orange plant. The project was being run by an outside, joint venture (Thompson-Stearns-Rodger). Examples:

- requests to bid on the operation of the plant for the military.
- trip reports reflecting Edgewood Arsenal personnel's trips to chemical plants.
- operating manual for Weldon Springs.
- correspondence from Stearns-Rodger to Edgewood Arsenal giving a progress report.
- memo from government representative at plant site.
- correspondence from Dow declining to participate.

C. Manner of using the defoliants was reasonable given the combat situation: In this section, we want to find facts that support our contention that any failure to follow normal safety and spray techniques resulted solely from important military purposes or from the wartime situation in which the defoliants were used. Use this general heading for anything that discusses the manner in which the United States used the defoliants.

1. Manner of labelling: The chemical companies claim that the U.S. prevented them from labelling the drums in the manner in which they would normally label. Note anything that reflects what was to be put on the drums and why that was the case. This could range from the contracts to the specifications to letters between the military and the chemical companies. Some types of information that could be important are:

- Limited labelling served a valid military purpose (e.g., enemy would not learn the exact defoliant being used; no one would know that American defoliants were being used).
- Labelling regarding safety precautions and use instructions were not required by law for defoliants used in foreign countries by military (look for anything that might indicate why they didn't follow the law even though they didn't have to do so).
- Correspondence between chemical company and military objecting to the limited labelling.
- Written instructions were to accompany drums on safety and handling procedures.

2. Manner of drumming and shipping: One of the factors that the chemical companies often bring up is the amount of defoliant that seemed to be leaking out of the drums. They allege that the U.S. was negligent in how it handled and stored these drums. We contend that our handling was reasonable given the war environment. We would note that the manufacturers contracted to provide sealed, non-leaking drums and that perhaps they provided us with defective drums. Note anything having to do with drumming, handling and shipping of the defoliant to Vietnam, including who had control of the defoliant once it arrived in Vietnam.

3. Ranch Hand (Air Force aerial spray missions) operated in a reasonably safe manner given the program's goals and environment: We contend that we did everything possible, given the war environment, to ensure that exposure to anyone was minimized while still ensuring the success of the program. Note anything that reflects how the Ranch Hand operations were conducted.

a. Many factors considered at many levels in selecting spray sites: Selection of spray sites was made following consideration of a wide variety of factors. These included accessibility of the spray site, presence of local population or friendly troops, military need to defoliate that area (no VC operating there), political considerations such as keeping the Province Chief happy, etc. The selection was a continuing process that had to go through several levls of command, although the site selection initiated with the province chiefs. Note anything that discusses the decision process and include all references to who made the decisions.

b. Ranch Hand personnel received adequate instruction on spraying and safety precautions: We contend that both ground and air crews received adequate instruction on how to spray and the precautions that should be taken while handling or spraying the defoliant. Note anything that might have impact upon this proposition. Examples include:

- when to turn off spray.
- what to do upon encountering enemy fire or spotting friendly troops.
- whether to wear gloves while loading C-123s.

c. Failure to follow those instructions resulted solely from the combat situation: Having instructed the Ranch Handers, it is fairly clear that they did not necessarily follow those instructions. We contend that any failure to follow those instructions or precautions resulted solely from the combat situation. Examples include:

- spray planes being fired on while at low altitude had to dump their spray load in emergencies no matter who was under them.
- putting down windows while spraying despite undrafting spray was done to minimize risk of shattered glass following enemy attack.

d. Every attempt made to minimize risk of spraying infantry troops: Ranch Hand coordinators consulted extensively with Army to minimize the risk of exposing infantry troops. Examples:

- document to Army indicating that Ranch Hand will be spraying certain coordinates on certain dates.

- After Action Report indicating a spray mission was aborted due to presence of friendly troops.

e. Spray planes often under attack: Ranch Hand missions were often under heavy fire from the enemy and Ranch Hand personnel were often decorated. Look for documents that reflect these facts. Example: Lessons Learned indicating the number of Ranch Hand planes lost in a particular time frame.

f. Aerial spraying was highly accurate: We contend that the spray missions were very accurate and that everything was done to minimize exposure. Efforts included spraying in the early morning hours to avoid spray drift. Look for documents that include the following references:

- accidental crop or tree damage.
- reparations made for accidental damage to rubber plantations.
- missed spray coordinates.
- amount of spray drift.

4. Ground forces using defoliants did so in a reasonable manner: The Army and the Marines also used defoliants to clear the perimeters around their bases. This cleared their fields of fire and prevented the enemy from sneaking up under cover. This appears to be a much more haphazard program. However, we would contend that this was reasonable in that they were more vulnerable to enemy attack. Use this general heading to note any document reflecting such use of defoliants by ground forces.

a. Spray personnel received adequate instruction on how to spray defoliants safely: Personnel using backpacks or spraying from trucks or helicopters received adequate instruction on how to spray defoliants. See examples under III.C.3.b.

b. Sprayed in manner minimizing contact with non-spraying personnel in spray area: Spraying was done in a manner that minimized contact with the spray for all persons in the area. Look for any document that might indicate that areas were cleared of personnel before spraying was done, etc.

c. Failure to follow precautions: It is fairly clear that not all possible precautions were taken. We contend that the reasonable precautions, given the situation, were taken. Failure to follow precautions was either due to combat situation, at an individual's choice or was unknown to the command officers. Look for documents that give any information about how ground troops acted around defoliants; e.g., they didn't wear their gas masks because of the heat.

d. Army stored defoliants properly: The chemical companies indicate that the military did not store the defoliants properly and that many persons were unnecessarily exposed because of that negligent storage. Therefore, look for anything regarding drum storage:

- report indicating that hundreds of drums at storage depot were leaking.
- Vietnamese had control of storage depot.
- Army redrummed when a leak developed.

5. All naval defoliation operations were conducted in a safe and reasonable manner (note any references to such operations by the navy here:

6. No health problems related to spray reported by ANYONE: Examples:

- Neither spray personnel nor ground troops who accidentally came in contact with defoliants complained of health problems directly related to defoliants.
- Medical reports of Ranch Handers indicating no health problems.
- Vietnamese, friendly or not, made no complaints of health problems from the spray of defoliants, although they complained about accidental crop or tree damage.
- Rallying VC indicated that villagers would get nauseated after eating food that had been sprayed with defoliants.

D. Decision to phase down defoliant program: Note any documents that reference or indicate the reasons why the defoliant program ended. Examples could be:

- Geneva Protocol
- Bionetics Report
- Cutting back on the American involvement.

IV. CONTRACT ISSUES (RCL): BE SURE TO NOTE ANYTHING THAT HAS ANYTHING TO DO WITH THE UNITED STATES' CONTRACTS WITH THE CHEMICAL COMPANIES.

A. Negotiating Process (note all documents that indicate U.S. issued performance bids, companies provided draft specifications):

1. Companies represented that chosen defoliants were safe:

2. Companies contracted voluntarily: Look for anything that indicates that the chemical companies were willing to produce the herbicides — i.e., that they were not forced to produce under the Defense Production Act.

B. Contract Terms: Note all documents relating to actual contract terms or requested terms.

1. Manufacturing process: Note anything that indicates that a specific type of process was required in manufacturing government defoliants.

2. Reimbursable costs: Note anything that indicates what was considered a cost of performance.

3. Indemnification clauses: Note anything that indicates the U.S. was either to indemnify manufacturers or hold them harmless from liability.

4. Labelling restrictions: Note anything that the U.S. prevented the chemical companies from putting additional information regarding safety precautions on the labels.

5. Impurities (note anything that indicates what the 2% impurities permitted in the defoliant were understood to be): We believe that the impurity clause dealt solely with inert ingredients and that dioxin was not contemplated as one of these impurities.

6. Chemical companies warranted their product against any defects: We need to know if the contracts contain such terms. If they do, then we need to discover just what was meant as a "defect". We would contend that dioxin is such a "defect". Look for anything that discusses these warranty provisions.

C. Satisfaction of Contract:

1. Meeting specifications (note anything that indicates what "meeting specifications" was intended to mean).

2. Rejection of shipments (note any time a shipment was rejected or the reasons the U.S. could reject shipments).

3. Price and profits: Indicate anything that indicates how much chemical companies were paid and how much profit they made.

.gent Orange Projects Office
Research Section (10A7B)
File System

DRAW I - A through Z

A

Agent Orange Conference Calls
Agent Orange Organization
Agent Orange Review
Agent Orange Literature Requests - Volume I and II

B

Dr. Breslin
Briefing for the Administrator and the Deputy Administrator
Budget
BVA - Agent Orange

C

Congressional Action - Agent Orange
Contractors/Consultants

D

Delegation of Authority
DM&S Issues
DM&S Organizational Chart
CMD Numbered Memorandums - August 11, 1983

E

Equipment Folder
- Canon
- Lanier
- Computer Terminal/Printer

F

Floor Plans
Freedom of Information Act
VA Standard Forms and Form Letters

G

H

Highlights

Draw I - A through Z (con't.)

I

Intergency Agreements/EPA/AFIP/GSA/WESTAT/MOSHMAN Associates
International Correspondence
Interoffice Correspondence
Inspector General's Office
I.P.A. Information

J

Journal Requests

K

Dr. Kang

L

Letters of Agreement
Local Travel

M

Memo for the Record
Media Inquires - Agent Orange
Miscellaneous Correspondence
Monthly Status Report - Agent Orange
Monthly Operational Report - Agent Orange

Mc

N

Newsclip

O

Officer Career Objective Statement
Outreach Program - Agent Orange
Office Services Folder

P

Position Description
Policy
Proceedings
Policy Coordinating Committee

Draw 1 - A through Z (con't.)

Q

R

Reproduction Requests (Slides, Telefax)
NIOSH Dioxin Registry
Report of Contacts
Research Section - Staffing
Resource Information-Non VA

S

Scientific Cooperation with Vietnam
Scientists Institute for Public Information
Space Survey - 1983
Servicemen's Group Life Insurance Program/First through the Sixteenth Annual Report

Slides

Adipose Tissue Analysis
Agent Orange - Briefing of U.S. Congress on October 20 and 27, 1983
American Chemical Society's Meeting - August 28 through September 2, 1983
Adipose Tissue Meeting - September 1, 1983
Slides Presented for Meeting on June 29, 1983
Enviornmental Fate of TCDD

T

Testimony Floder
Transcript - Nightline 4/15/83
Trip Reports

U

V

VA Library

W

Weekly Operational Report - Agent Orange
White Paper
Women in Vietnam

XYZ

DRAW II - III Studies, Reports and Meetings

VA Studies and Dr. Young's Speeches, Literature Review, Monograph Series , 1981 Dioxin Symposium

Federally Sponsored Human Studies Related to Agent Orange
Federally Sponsored Laboratory Studies and Literature Surveys Related to Agent Orange

Retrospective Adipose Tissue Study

Retrospective Adipose Tissue Meeting - December 13, 1982
Correspondence
Retrospective Adipose Tissue Study (VA/EPA Contract)
Retrospective Adipose Study Analytical Laboratory

Adipose Tissue

Adipose Tissue
EPA - Retrospective Adipose Tissue Meeting - March 2, 1983
Retrospective Adipose Tissue Meeting - February 4, 1983

Agent Orange

Correspondence
1982 GAO Report
Agent Orange Registry
Status Reports
AFIP Agent Orange Tissue Registry

Chloracne

Chlorance Task Force

Dioxin Research Study

Melioidosis

Melioidosis

Soft Tissue Sarcoma

Soft Tissue Sarcoma

Agent Orange Data System

Army/VA Agent Orange Data System

Draw II - III Studies, Reports and Meetings (con't.)

Centers for Disease Control (CDC) - Birth Defects

CDC Birth Defects

Vietnam Experiences Twin Study (VETS)

VETS - January 7, 1983
Correspondence
St. Louis Trip
Budget
Proposal
Development Proposal

Vietnam Veterans Mortality Study

Vietnam Veteran Mortality Study
Correspondence
Death Certificates - Letters/Response
Mortality Study - State Death Certificates
The Vietnam Experience/Wisconsin Study

Vietnam Service Indicator (Patient Treatment File-PTF)

Vietnam Service Indicator in PTF

Non-VA Studies

RANCH HAND Association

Study
Correspondence and Newsletters
Diseases of Sentry Dogs in Vietnam - DOD/AFIP

Reports

GAO - Improvements Needed in VA's Efforts to Assist Veterans Concerned about Agent Orange

Briefing

Administrator's Briefing - 12/7/82
Testimony 9/15/82 Vet's Affairs

Meetings

Advisory Committee Meeting - May 20, 1983
SMAG Meeting - May 18-19, 1983 - Special Medical Advisory Group
Advisory Committee Meeting - February 24, 1983
CCERP Meeting NIH - January 27, 1983
PCP Meeting - January 18, 1983
PCP Meeting - December 10, 1982

Draw II and III Studies, Reports and Meetings (con't.)

SAMG Meeting - September 28-29, 1982
Veterans's Affairs Committee Meeting - September 15, 1982
Pentacholophenol Meeting - August 12, 1982
"Epi Study" Meeting - June 24-25, 1982
Monograph Series Publication Meeting - March 9, 1983
Advisory Committee Meeting - December 6,1983
The Rockefeller University Symposium "Public Health Risks of the Chlorinated Dioxins," October 19-10, 1983
Forest Pest Management Workshop Portland, Oregon - October 24-27, 1983
"Dioxin in the Environment" Symposium on December 6-9, 1983, Michigan
AAD Symposium, "Dioxin, Chloracne and the Dermatologist" on 12/3-5/83, CA
American Chemical Society Meeting - August 28 through September 2, 1983
Advisory Committee Meeting - September 1, 1983
Committee on Veterans' Affairs Meeting - June 15, 1983
Public Hearings Committee on Veterans' Affairs - June 22, 1983
Subcommittee on Natural Resourses, Agriculture Research and Environment Hearing on Dioxin Health Effect- - June 30, 1983
Advisory Committee Meeting - September 1, 1983

Malathion

Copies of Speeches/Presentations

Presentation to Dioxin Task Force Missouri Department of Natural Resources Jefferson City, MO - April 14, 1983, Part I, Part II and Part III
Review of Literature on Herbicides Including Phenoxy Herbicides and Associated Dioxins
Flyers
Long-Term Field Studies of a Rodent Population Continuously Exposed to TCDD
The Absence of Hepatic Cellular Anomalies in TCDD - Exposed Beach Mice - A Field Study
"Preprint Extended Abstract" Dioxin in Body Fat and Health Status: A Feasibility Study
"Preprint Extended Abstract" Environmental Fate of TCDD - Conclusion from Three-Long Term Field Study
"Preprint Extended Abstract" Rationale and Description of the Federally-Sponsored Epidemiologic Research in the United States on the Phenoxy Herbicides and Chlorinated Dioxin Contaminants
A Review of on-going Epidemiologic in the United States on the Phenoxy Herbicides and Chlorinated Dioxin Contaminants. Third International Symposium of Chlorinated Dioxins and Related Compounds, Salzbyrg, Australia - October 14, 1982
Fate of 2,3,7,8-TCDD in an Ecosystem Treated with Massive Quantities of 2,4-D and 2,4,5-T Herbicides Presented to California Weed Conference January 1982
"Persistance, Bioaccmulation, and Toxicology of TCDD in an Ecosystem Treated with Massive Quantities of 2,4,5-T Herbicides" Presented to The Western Society of Weed Science March 1981
"Persistance, Bioaccmulation and Toxicology of TCDD in an Ecosystem Treated with Massive Quantities of 2,3,4,5-T Herbicides" Presented to American Chemical Society - September 1979

Draw II and III Studies, Reports and Meetings (con't.)

Review of Use, Fate and Toxicology of Herbicides Blue 1980
Ultrastructual Comparison of Liver Tissue from Field and Lab TCDD Exposed Beach Mice.
Determination of Blood Lead Elimination Patterns of Primary Lead Smelter Workers - Han K. Kang, Peter F. Infante
Long-Term Field Studies of a Rodent Population Continuously Exposed to TCDD
? Monograph Series
Persistance, Movement and Decontamination Studies of TCDD in Storage Sites Massively Contaminated with Phenoxy Herbicides-Third International Symposium of Chlorinated Dioxins and Related Compounds, Salzburg, Australia - October 14, 1982
Department of the Air Force Presentation of the House Veterans' Affairs Committee, Subcommittee on Oversight and Investigation
Human and Environmental Risks of the Chlorinated Dioxins and Related Compounds, Plenum Press 1982. "Long-Term Studies on the Persistance and Movement of TCDD in a Natural Ecosystem"
Long-Term Field Study of 2,3,7,8-TCDD Presentation to the Chemicals in the Environment Symposium - Copenhagen, Denmark - October 19, 1982
"Agent Orange- Review and update" Presented to California Weed Conference, January 1982
Fate of TCDD in Field Ecosystems - Assessment and Significance for Human Exposures/ East Lansing, Michigan - December 7, 1983
Health Surveillance of Vietnam Veterans Claiming Agent Orange Exposure/ACS Meeting - August 30, 1983
Evaluation of Veterans for Agent Orange Exposure
An Overview of Laboratory and Waste Management Guidelines

Monograph

Chlorance Monograph
Monograph Series - VA Employee Forms
Dr. Annemarie Sommer - Birth Defects Monograph
Dr. Terry L. Lavy - Human Exposure to Phenoxy Herbicides
Dr. Ronald D. Hood - Agent Blue

Literature

Backup and update Material

1981 Dioxin Symposium

1981 Dioxin Symposium Manuscript Instruction
1981 Dioxin Symposium Panel Reports

Draw IV - Research Projects Office Committees

Travel

Dioxin Symposium - December 3, 1983
November 15, 1983 - Trenton, NJ (Talk Show) Rutgers University (Seminar)
October 18-20, 1983 Rockefellow University - Public Health Risks of the Chlorinated Dioxins
New York, NY
Dallas, Texas - 111th Annual Meeting Public Health Association - November 14-17, 1983
Trip - St. Louis, MO - August 24, 1983 Adipose Tissue/Mission Dioxin Task Force
Columbia/St. Louis/Jefferson City
TDY Newark, NJ - August 4, 1983
Trip Reports By 10A7 and 10A7A
Atlanta, GA - June 27-28, 1983
Ft. Walton Beach, FL - July 6-15, 1983
Seveso, Italy - June 8-16, 1983/Italians Trip to Washington August 30 through September 1, 1983
St. Louis/Jefferson, MO - July 20-23, 1983
Winnipy, Canada - June 14-17, 1983
Philadelphia - May 23-26, 1983
Expert Panel - June 7, 1983 New York, NY
Chicago O'Hara November 6-7, 1982 - Illinois A.O. Commission Meeting
Proposed Trip and Presentation - Wood, Wisconsin August 25, 1982
Trip - San Antonio and Houston, TX - May 4-6, 1982 Review of Air Force Health Study
Portland - July 17, 1983
Columbus, Ohio - June 13-14, 1982
Copenhagen - October 18-20, 1982 Chemicals in the Environment Symposium
Trip to Winston Salem, NC April 26-28, 1982 - Presentation to Division of Veterans Affairs and TRIAD Vietnam Veterans Association - Major Young
Binghamton - March 28-30, 1982
September 16, 1982 - Elgin AFB Tuscaloosa/Kansas City/St. Louis
1982 WSSA Meetings - Boston, MA February 9-11, 1982
TDY - San Diego January 18-21, 1982 - Dr. Young
Salzburg - October 11-15, 1982, Copenhagen - October 18-20, 1982, London October 21-22, 1982, Amsterdam - October 25-28, 1982, Basle - October 26-28, 1982 Cancelled
St. Louis/Fayetteville - February 6-12, 1983
New York City - January 20, 1983
St. Louis - December 5-8, 1982

Draw IV - Research Projects Office Committees (con't.)

1982 International Dioxin Conference - Salzburg, Australia
London - October 21-22, 1982 Dioxins and Human Exposure Seminar
IAES (Coulston) Dioxin Conference, Bethesda, MD - October 4-7, 1981
TDY - VET Center In-Service Education Program - September 14-17, 1981
Dr. Kang
1980 Rome Dioxin Conference

SETAC - Society of environment and Toxicology Chemistry

Environment Medicine Office

Environmental Medicine Office Reorganization - February 1982
Agent Orange Activities History and Summaries

Committees

VA Advisory Committee on Herbicides
1982 Annual Report - Advisory Committee on Health-Related Effects on Herbicides
AAOTF/AO Data System
Army Agent Orange Task Force (AAOTF)
USDA/EPA - Silvex 2,4,5-T Registration Committee
VA Policy Coordinating Committee
Agent Orange Working Group (AOWG) Science Panel - Subcommittee on Exposure
Agent Orange Working Group (AOWG) Science Panel

Draw V - States

Coalition of State Agent Orange/Dioxin Commission

California - State Dioxin/Herbicide/Agent Orange Commission
Connecticut - State Dioxin/Herbicide/Agent Orange Commission
Georgia - State Dioxin/Herbicide/Agent Orange Commission
Hawaii - State Dioxin/Herbicide/Agent Orange Commission
Illinois - State Dioxin/Herbicide/Agent Orange Commission
Indiana
Kansas
Louisiana
Maine - State Dioxin/Herbicide/Agent Orange Commission
Massachusetts - State Dioxin/Herbicide/Agent Orange Commission
Michigan
New Jersy - State Dioxin/Herbicide/Agent Orange Commission
New York - State Dioxin/Herbicide/Agent Orange Commission
Minnesota
Ohio
Oklahoma - State Dioxin/Herbicide/Agent Orange Commission
Oregon
Pennsylvania - State Dioxin/Herbicide/Agent Orange Commission
South Dakot
Tennessee
Texas - State Dioxin/Herbicide/Agent Orange Commission
Washington
West Virginia - State Dioxin/Herbicide/Agent Orange Commission
Wisconsin - State Dioxin/Herbicide/Agent Orange Commission

Specially Solicited Research Projects

Agent Orange Safety Plan - Budget
Agent Orange Safety Plan - VAMC Albuquerque, NM
Agent Orange Safety Plan - VAMC Baltimore, MD
Agent Orange Safety Plan - VAMC East Orange, NJ
Agent Orange Safety Plan - VAMC Lexington
Agent Orange Safety Plan - VAMC Madison, WI
Agent Orange Safety Plan - VAMC Nashville, TN
Agent Orange Safety Plan - VAMC San Francisco, CA
Agent Orange Safety Plan - VAMC Sepulveda, CA
Safety Plan - VAM&ROC Sioux Falls, SD
Agent Orange Safety Plan - Washington, DC
Safety Plan - VAMC West Haven, CT
Safety Plan - VAMC White River Junction, VT

Draw V - States (Con't.)

Safety Plan - VAMC Wood, Wisconsin
Agent Orange Safety Plan Status of Review
Agent Orange Safety Plan Meeting - August 17, 1982
Program Discription
1982-1983 - Porphyrin Studies of Veterans - Ronald Codario
RANCH HAND Vietnam: 1962-1971 Articles and Reports
JRB Associates
Austrian Veterans Health Studies
UBTL - A Division of the University of Utah Research Institute
National Opinion Research Center (NORC)
WESTAT Res. Corp.
AMVETS Meeting March 16, 1983 - Arlington, Virginia
Battelle Laboratories
Waste Management, Inc.
Mario Negri Institute, Milan, Italy