Erika L. Muse
212.453.0756 (direct)
emuse@gordonrees.com

GORDON&REES
SCULLY MANSUKHANI

ATTORNEYS AT LAW
1 BATTERY PARK PLAZA
28TH FLOOR
NEW YORK, NY 10004
PHONE: (212) 269-5500
FAX: (212) 269-5505
WWW.GORDONREES.COM

March 24, 2017

Environmental Protection Agency

VIA WEBSITE SUBMISSION ONLY

Re: *Sharon Ward, et al. v. Colgate-Palmolive Company, et al.*
Supreme Court of the State of New York, New York County
Index No.: 190091/2016
Our File No.: 1131825

Dear Sir/Madam:

Please consider the following a formal request pursuant to the Texas Public Information Act, §6252-17a et seq., I hereby request a copy of any and all documents, records, correspondence, contracts, reports, logs, test results, permits, citations/violations, hazardous waste disposal manifests, or any other records in any form (written or digital) pertaining to:

Maple Lawn Elementary School
Dallas Independent School District
3120 Inwood Road
Dallas, TX 75235

Reinhardt Elementary School
Dallas Independent School District
10122 Losa Drive,
Dallas, TX 75218

Casa View Elementary School
Dallas Independent School District
2100 N. Farola Drive
Dallas, TX 75228

Martha Turner Reilly Elementary School
Dallas Independent School District
11220 Lippitt Avenue
Dallas, Texas 75218

W.H. Gaston Middle School
Dallas Independent School District
9565 Mercer Drive
Dallas, TX 75228

Bryan Adams High School
Dallas Independent School District
2101 Millmar Drive
Dallas, TX 75228

Charles A. Gill Elementary School
Dallas Independent School District
10910 Ferguson Road
Dallas, TX 75228

With respect to the locations above, please accept this letter as a request for copies of the following documents specifically during the timeframe of **1950 to present.**

- Any and all records regarding asbestos;
- Any and all records regarding inspections for asbestos;
- Any and all records regarding installation or removal of asbestos;
- Any and all records pertaining to use of asbestos-containing products and asbestos-containing equipment;
- Any and all records regarding policies, procedures, inspection reports, asbestos management plans, and asbestos abatement actions performed pursuant to Asbestos Hazard Emergency Response Act (AHERA), or any other applicable governing authorities, including OSHA;
- Any and all records relating to air testing, or other dust-release testing performed and any and all asbestos analysis data sheets;
- Any and all records relating to asbestos remediation, including those that identify asbestos removal contractors and any contracts or reports for the removal of asbestos; and
- Any and all specification sheets for insulating materials, including but not limited to pipe insulation.

In order to help you to determine my status to assess fees, please note that I am an attorney who is seeking the above information for use in a pending lawsuit. I am willing to pay fees for this request up to a maximum of $100.00. If you estimate that the fees will exceed this limit, please contact me first.

If you deny any part of this request, please cite each specific reason you believe justifies your refusal to release the information and notify me of the applicable appeal procedures available under the law.

If you have any questions regarding the processing of this request, please do not hesitate to contact the undersigned. Thank you for your consideration of my request.

Regards,

Gordon Rees Scully Mansukhani, LLP

Erika L. Muse