

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>JAMIE LEIGH JONES</b>	§	
<b>Plaintiff,</b>	§	
	§	
<b>vs.</b>	§	<b>CIVIL ACTION NO. 4:07-CV-02719</b>
	§	
<b>HALLIBURTON COMPANY d/b/a KBR</b>	§	
<b>KELLOGG BROWN &amp; ROOT (KBR);</b>	§	
<b>KELLOGG BROWN &amp; ROOT, SERVICES,</b>	§	
<b>INC.; KELLOGG BROWN &amp; ROOT</b>	§	
<b>INTERNATIONAL, INC; KELLOGG BROWN</b>	§	
<b>&amp; ROOT, LLC; KELLOGG BROWN &amp; ROOT</b>	§	
<b>INC.; KELLOGG BROWN &amp; ROOT, S. de</b>	§	
<b>R.L.; KELLOGG BROWN &amp; ROOT (KBR),</b>	§	
<b>INC.; KBR TECHNICAL SERVICES, INC.;</b>	§	
<b>OVERSEAS ADMINISTRATIVE SERVICES,</b>	§	
<b>LTD.; ERIC ILER, CHARLES BORTZ; and</b>	§	
<b>SEVERAL JOHN DOE RAPISTS</b>	§	
	§	<b>JURY TRIAL DEMANDED</b>
	§	
<b>Defendants.</b>	§	

**PLAINTIFF’S SECOND AMENDED PROPOSED EXHIBIT LIST**

PRESIDING JUDGE: Hon. Keith P. Ellison			PLAINTIFF’S ATTORNEY: L. Todd Kelly		DEFENDANTS’ ATTORNEYS: Dan Hedges – KBR Defendants Andrew McKinney – Bortz Defendant
TRIAL DATE(S): June 13, 2011			COURT REPORTER:		COURTROOM DEPUTY:
PLF NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES (Bates Label)
1					Lahiri Letter RE: 11/23/01 Augmentation (KBR000005)
2					KBR Email Exchanges; Dated July 5, 2001; Subject: Sexual Harassment Complaint (KBR-E-02059 through KBR-E-02061)
3					KBR Email to Ron Boutwell from G. Andino; Dated July 19, 2005; Subject: Email for Record – Craig King (KBR00314)
4					KBR Email Exchanges; Dated July 5, 2005; Subject: Sexual Harassment Complaint (KBR-E-02071 and KBR-E- 02072)
5					Letter from Shqipe Tinova to Ron Boutwell, Gabe Andino, Remo Butler and Jerry Bradley; Subject: Formal Complaint of Sexual Harassment Against Mr. Craig King; Dated July 4, 2005

6					KBR Email Exchanges; Dated August 1, 2005; Subject: DOS Guides (KBR000483-484 and KBR-Jones-000057-58)
7					KBR Email Exchanges; Dated July 29 <sup>th</sup> and 30 <sup>th</sup> , 2005; Subject: Alcohol Consumption Within KBR Campus (KBR-E-02094-02097)
8					KBR Email from Tommy Shook to Gabe Andino; Subject: DOS Guides (KBR-E-02122)
9					KBR Email Exchange between Dan Maguire and Tommy Shook; Subject: Incident Update; Dated July 29, 2005 (KBR-E- 02164)
10					Email Exchange Between Ron Boutwell and Gabe Andino; Dated October 12, 2005; Subject: Rape Allegation (KBR-E-02109)
11					E-mail Exchanges; Dated: October 11 and 12, 2005; Subject: Rape Allegation (KBR-E-02110 through KBR-E-02112)
12					KBR Email Exchanges; Dated July 29 <sup>th</sup> and 30 <sup>th</sup> , 2005; Subject: Incident Update (KBR002550-KBR002553)
13					KBR Email from Tommy Shook to Dan Maguire; Dated July 29, 2005; Subject: Incident Update (KBR-E-02165)
14					KBR Email Exchanges; Dated July 29 <sup>th</sup> and 30 <sup>th</sup> , 2005; Subject: Incident Update (KBR000457-KBR000458 and KBR-Jones-000031 through KBR-Jones-000032)
15					KBR Email Exchanges; Dated July 30, 2005; Subject: Incident Update (KBR-E-02169 through KBR-E-02172)
16					KBR Email Exchanges; Dated July 29 <sup>th</sup> and 30 <sup>th</sup> , 2005; Subject: Incident Update (KBR-E-02173 through KBR-E-02176)
17					KBR Email Exchanges; Dated August 12, 2005; Subject: Jamie Jones Reemployment Status (KBR-E-02202 through KBR-E-02204)
18					KBR Email Exchanges; Dated September 16 <sup>th</sup> and 17 <sup>th</sup> , 2005; Subject: Jamie Jones 3 <sup>rd</sup> Request for Personal Item (KBR-E-01955)
19					KBR Email Exchanges; Dated September 16 <sup>th</sup> and 17 <sup>th</sup> , 2005; Subject: Jamie Jones 3 <sup>rd</sup> Request for Personal Item

					(KBR-E-01959)
20					KBR Email Exchange Between Gerald Warner and Gabe Andino; Dated December 11, 2007; Subject: FOX News (KBR-E-01957)
21					Project Training Plan, Brown & Root (Exhibit 3 to Deposition of AMY KATZ)
22					“Proposal for Program of Instruction: Training Trainers” by Amy Katz, Theater Training & Development Coordinator (Exhibit 4 to Deposition of AMY KATZ; and JLJ02338)
23					Email from Amy Katz to Robert Ellis, Dave Capouya, John Downey, Dee Mistry, Kara Hall and Donald Ellis. Dated July 12, 1998 (Exhibit 5 to Deposition of AMY KATZ)
24					Email from Robert Ellis to Jack Avant, dated July 31, 1998 (Exhibit 6 to Deposition of AMY KATZ)
25					Email from Robert Ellis to Amy Katz, Dated July 17, 1998 (Exhibit 7 to Deposition of AMY KATZ)
26					Email from Robert Ellis to Amy Katz, Dated July 10, 1998 (Exhibit 8 to Deposition of AMY KATZ)
27					Email from Robert Ellis to Amy Katz, Dated July 17, 1998 (Exhibit 9 to Deposition of AMY KATZ)
28					KBR Email (KBR001212)
29					KBR Email (KBR001215)
30					KBR Email (KBR001218)
31					KBR Email (KBR002335-KBR002338)
32					KBR Email (KBR002441-2442)
33					KBR Email (KBR002545)
34					Email (KBR002658-KBR002663)
35					KBR Email (KBR002672-2673)
36					KBR Letters to Employees or Former Employees (KBR 002674-002675, KBR 002678-2699, KBR 002702-002721, KBR002722-KBR002725)
37					Medical Records – Sadler Clinic/Terri J. Scott, MD (0001-0005, 15, 17, 31) AND (Sadler Clinic 0066) – this page is from an additional copy of the records)
38					Medical Records (& Photographs) – Michael Ciaravino,

					MD (0001-0008,11)
39					Billing Records – Michael Ciaravino, MD [Ciaravino, M.D. (bill) 0001-0002]
40					Medical Records (& Photographs) – Michael L. Eisemann, MD (Michael Eisemann, M.D. 001-004)
41					Billing Records – Michael L. Eisemann, MD (Michael Eisemann, M.D. 001)
42					Medical Records (& Photographs) – Sabrina Lahiri, MD (26-95)
43					Billing Records – Sabrina Lahiri, MD (Lahiri, MD (bill) 0001)
44					Medical/Counseling Records – Nicole Dockter, LCSW (1-22)
45					Billing Records – Nicole Dockter, LCSW (Nicole Dockter, LCSW 0001-0003)
46					Medical/Counseling Records – James Paskowitz, MD (1- 11 + supplemental page)
47					Billing Records – James Paskowitz, MD (Paskowitz, MD 0012-0013)
48					Medical/Counseling Records – Diana Guest, MA, MFT (01-21)
49					Billing Records – Diana Guest, MA, MFT (Diana Guest, MA Billing 0001-0002)
50					Medical/Counseling Records – Dawn Nelson, LCSW (0001-0146, 149, 166)
51					Billing Records – First Street Surgical (First Street Surgical Billing 0001-0003)
52					Medical Records – St. Luke’s Hospital (produced by Defendants) [pgs. 78-152]
53					File of Congressman Ted Poe (TP 5, 11, 14, 18, 34-35, 42- 43, 74-75)
54					Photograph of Charles Bortz – Okaloosa County Conviction (1)
55					Code of Business Conduct (JLJ 00386-00397)
56					Income Tax Forms.pdf

					(JLJ 00398-00402)
57					Emergency Contact List (JLJ 00403-00404)
58					KBR LOGCAP Tax and Payroll Briefing (JLJ 00627-00648)
59					Medical Evaluation – Dockter (JLJ 00904-00904)
60					Medical Assessment – Weinberg (JLJ 00914-00914)
61					Amy Katz E-Mails (JLJ 01355 A thru G)
62					Amy Katz Documents (JLJ 02316-02432)
63					Committee Hearing of US House of Representatives (JLJ 3448-3452)
64					Emails to and from Jamie Jones (JLJ 03467)
65					Emails to and from Jamie Jones (JLJ 03471-03477)
66					Amy Katz Presentation (JLJ 03501-03534)
67					“Don’t Tell; Don’t See; Don’t Hear” Photograph (1) (JLJ 01677)
68					Photo – JLJ 01693
69					Photo – JLJ 01694
70					Photo – JLJ 01708
71					Photo – JLJ 01709
72					Photo – JLJ 01710
73					Photo – JLJ 01711
74					Photo – JLJ 01712
75					Photo – JLJ 01713
76					Photo – JLJ 01714
77					Photo – JLJ 02434
78					Photo – JLJ 03123
79					KBR Documents and employment agreement KBR 002731-2750

Respectfully submitted,

/s/ L. Todd Kelly

**THE KELLY LAW FIRM, P.C.**  
L. Todd Kelly (Lead Counsel)  
Texas Bar No. 24035049  
S.D. Tex. No. 724727  
Heidi O. Vicknair  
Texas Bar No. 24046557  
S.D. Tex. No. 568715  
One Riverway, Suite 1150  
Houston, Texas 77056  
Tel. (713) 255-2055  
Fax. (713) 523-5939  
[todd@kellylawfirm.org](mailto:todd@kellylawfirm.org)  
[heidi@kellylawfirm.org](mailto:heidi@kellylawfirm.org)

**THE ESTEFAN FIRM**  
Ron Estefan  
Texas Bar No. 00785851  
S.D. Tex. No. 16029  
One Riverway, Suite 1150  
Houston, Texas 77056  
Tel. (713) 526-1100  
Fax. (713) 523-5939  
[ron@justiceseekers.com](mailto:ron@justiceseekers.com)

**LAW OFFICE OF STEPHANIE MORRIS**  
Stephanie M. Morris  
27 S. Darlington Street  
West Chester, Pennsylvania 19382  
Tel. (610) 579-8053  
Fax. (610) 410-8053  
*Admitted Pro Hac Vice*  
[stephanie@smorrislegal.com](mailto:stephanie@smorrislegal.com)

***ATTORNEYS FOR PLAINTIFF, JAMIE JONES***

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record were served with true and correct copies of the attached by ECF on this 12<sup>th</sup> day of June, 2011:

*/s/ L. Todd Kelly*