CAUSE NO. 09-CV-0147

IN RE:	§	**IN THE DISTRICT COURT OF**
	§	
	§	**GALVESTON COUNTY, TEXAS**
HURRICANE IKE LITIGATION	§	
	§	**212TH JUDICIAL DISTRICT**

PLAINTIFFS' NOTICE OF ORAL AND VIDEOTAPED DEPOSITION OF JOHN L. SCHROEDER WITH DUCES TECUM

TO: All Counsel of Record.

Please take notice that under Texas Rule of Civil Procedure 199.2, Plaintiffs will take the oral and videotaped deposition of JOHN L. SCHROEDER on April 12, 2010, beginning at 10:00 a.m. at the San Luis Hotel, 5222 Seawall Boulevard, Galveston, Texas 77551; (800) 445-0090. The deponent is requested to produce any and all documents and things requested in the duces tecum attached hereto as Exhibit "A".

The deposition will be recorded stenographically and on videotape. The stenographic recording will be taken before a certified shorthand reporter associated with Worldwide Court Reporting, 3000 Weslayan, Suite 235, Houston, Texas; (713)-572-2000.

The deposition will continue from day to day until completed. You are invited to attend and cross-examine.

Respectfully submitted,

THE MOSTYN LAW FIRM

BY: J. Steve Mostyn

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document will be served or has been served on all interested parties in accordance with the Texas Rules of Civil Procedure on the **March 25, 2010** as set forth below:

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J. Steve Mostyn

Exhibit A
Duces Tecum to John L. Schroeder

Requests:

1. Any and all reports, drafts of reports, documents, calculations, spreadsheets, data, notes, photographs, videos, drawings and other materials and items generated by you or relied upon or reviewed by you, whether kept on paper, computer or otherwise, in reaching your conclusions, opinions or mental impressions in the Hurricane Ike litigation.

2. Any and all publications, treatises, articles, journals, texts, abstracts, seminar materials, documentation, reference items, regulations, statutes or other materials relied on, used, consulted, reviewed or referenced by you in coming to your conclusions, opinions or mental impressions in the Hurricane Ike litigation.

3. Your current curriculum vitae or resume.

4. All documents, spreadsheets, data, calculations, notes, reports, drafts of reports, photographs, videos, drawings and other materials and items sent or furnished to you by Texas Windstorm Insurance Association (TWIA), TWIA's counsel or TWIA's agents, representatives or employees or by any other expert concerning the Hurricane Ike litigation.

5. All documents, spreadsheets, data, calculations, notes, reports, drafts of reports, photographs, videos, drawings and other materials and items sent or furnished by you to Texas Windstorm Insurance Association (TWIA), TWIA's counsel or TWIA's agents, representatives or employees or any other expert concerning the Hurricane Ike litigation.

6. All billing records, invoices and other documents, including any schedule or list of amounts that show your charges and/or time spent in the Hurricane Ike litigation.

7. Any contracts or agreements between you and Texas Windstorm Insurance Association (TWIA).

8. A copy of your current engineering license(s).

9. Copies of any expert testimony, including affidavits, reports, whether recorded, on tape, or reduced to writing previously given by witness;

10. A copy of every draft and the original of every report prepared by witness in regard to Hurricane Ike Litigation. This includes any work prepared at the request of Texas Windstorm Insurance Association, counsel for Texas Windstorm Insurance Association or representatives of Texas Windstorm Insurance Association as well as all working drafts that may have been originated by witness himself, anyone working for him or anyone he has consulted in reference to the work he has done on this case for Texas Windstorm Insurance Association;

11. All of witness' notes concerning the assignments and/or work he has done on his own and/or at the request of Texas Windstorm Insurance Association in regard to this matter; this request includes all reports and case summaries prepared by witness or prepared for witness by any individual working with him.

12. A copy of every paper written by witness for a professional group, professional trade journal, commercial endeavor, continuing education, governmental bodies on the subject(s) on which he has been asked to comment or give an opinion in this case;

13. Records of time, expenses and charges for time witness has spent on any matter related to Hurricane Ike litigation and services rendered to Texas Windstorm Insurance Association.

14. Copies of any other opinion letter, document containing openings, depositions or affidavits containing opinions or opinion testimony by witness in other actions (to-wit: other lawsuits governmental proceedings and adjudicative proceedings) in which witness appeared, testified or otherwise gave opinion testimony as an expert for this Defendant anywhere.

15. Copies of any documents evidencing this witness being stricken as an expert as well as any documents evidencing any de-designation of this witness as an expert in any Hurricane Litigation in the last 10 years.