

EMMETT COLE, JR.  
1930-2017  
JAMES W. COLE  
\*BOARD CERTIFIED-PERSONAL INJURY TRIAL LAW  
\*\*BOARD CERTIFIED-CIVIL TRIAL ADVOCATE  
CHUCK COLE  
WILLIAM L. SCIBA, III  
\*BOARD CERTIFIED-PERSONAL INJURY TRIAL LAW  
\*\*BOARD CERTIFIED-CIVIL TRIAL ADVOCATE  
LUTHER EASLEY  
EVAN ANDERS  
REX L. EASLEY, JR., *of Counsel*  
\*BOARD CERTIFIED-PERSONAL INJURY TRIAL LAW  
SAMUEL COLE, *of Counsel*  
TRAVIS G. EDWARDS, *of Counsel*  
\*BOARD CERTIFIED-OIL, GAS AND MINERAL LAW

\*TEXAS BOARD OF LEGAL SPECIALIZATION  
\*\*NATIONAL BOARD OF TRIAL ADVOCACY

COLE,  
COLE,  
EASLEY &  
SCIBA, P.C.

TRIAL ATTORNEYS



302 W. FORREST  
VICTORIA, TEXAS 77901

(361) 575-0551  
FAX (361) 575-0986

[www.cceslaw.com](http://www.cceslaw.com)

June 16, 2025

Re: *Chemical Exposure – 1/6/2024*  
*Cause No. 24-01-90662-A; Shamrock Lawsuit*

Dear Client(s):

This letter is to follow up with you regarding your claim against Shamrock for injuries or damages you have claimed you received from the chemical spill that occurred at the Shamrock Products facility on January 6, 2024.

If you have not furnished copies of medical records, medical bills and/or invoices showing out of pocket expenses incurred due to this lawsuit, please do so immediately. **It is VERY IMPORTANT that you provide us with the information AS SOON AS POSSIBLE, but no later than July 31, 2025.**

Each individual claimant's case is being evaluated by the medical information and receipts that we receive from the clients. Medical records and medical bills that you can provide on behalf of injuries sustained is very helpful to your individual claims.

In addition, we need to be kept informed of any changes in the problems you are experiencing because of your chemical exposure, including changes in your condition or medical treatment.

Attached is a questionnaire that we need you to fill out to update us on your status. If you have filled this questionnaire out and returned at an earlier date and there have been no changes, please make a note on the questionnaire that there have been no changes and return it.

**Again, please notify us immediately if you change mailing address, email address or telephone number.**

You may email the questionnaire to [Shamrock@chuck.filevineapp.com](mailto:Shamrock@chuck.filevineapp.com), mail it to 302 W. Forrest, Victoria, Tx 77901, fax it to 361-575-0986, or you are welcome to drop it by the office.

Finally, please keep in mind that social media posts may be admissible in the lawsuit. We ask that you not post any information regarding your case or injuries.

Your failure to communicate with us will result in this law firm no longer representing you.

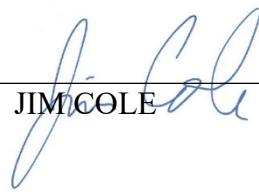
Sincerely,

*Emilio Ortiz JJJ*

COLE, COLE, EASLEY & SCIBA, P.C.

BY:

JIM COLE

A handwritten signature in blue ink that reads "Jim Cole". The signature is fluid and cursive, with "Jim" on top and "Cole" below it, though the two words are somewhat interconnected.

EO

DATE: 06/17/2025

## Shamrock Products Chemical Exposure Questionnaire

(Attach additional pages if necessary)

Describe in as much detail as possible ALL physical and mental difficulties and symptoms you have experienced because of your chemical exposure. Include in your answer the date the problems began and if the problems have resolved, when they resolved, to the best of your recollection.

The Shamrock Oil Spill on January 6, 2024, at the Victoria, Texas Barge Canal, has profoundly and severely impacted my health, particularly my vision and overall well-being. I am suffering from numerous debilitating symptoms directly attributable to this chemical exposure.

My right eye continuously releases uncontrollable tears, and the gland is persistently inflamed, red, and intensely itchy. I experience excessive eye mucus, leading to chronic eye redness, discomfort, and severe vision problems, including blurry vision and significant difficulty focusing on objects. Both my left and right eyes periodically become blurry and unfocused throughout the day. This has caused substantial damage to my quality of life. Furthermore, I endure relentless, periodic migraines that occur every single week, further

List the names, addresses and telephone numbers of ALL doctors, clinics or hospitals and pharmacies that provided treatment to you for injuries because of the exposure and describe the medical treatment including hospitalizations, doctor visits, prescriptions and medical tests.

treatment for injuries related to the Shamrock Oil Spill exposure:

Citizens Hospital Center

If you missed work because of your exposure, state the name of your employer(s), the dates you missed work, your rate of pay and the total amount of your lost income.

After the Shamrock Oil Spill occurred at the Victoria Texas Barge Canal on January 6, 2024, I stopped working at Advanced Drainage Systems. I was employed as a downstream technician at their location at 801 Hickey Street, Yoakum, Texas 77995. The reason I had to stop working was directly due to the blurry vision in both my eyes, which was caused by the Diamond Shamrock Products Oil Spill. The one-hour drive to Yoakum became impossible to manage with my impaired vision, making it necessary for me to discontinue my employment.

**Provide copies of all receipts and bills for expenses you incurred due to your injuries and verification of lost income.**