



## eDiscovery Case Study

*By*

**A.J. Krouse**

*Presented At*

The Digital Forensic Research Conference

**DFRWS 2011 USA** New Orleans, LA (Aug 1<sup>st</sup> - 3<sup>rd</sup>)

DFRWS is dedicated to the sharing of knowledge and ideas about digital forensics research. Ever since it organized the first open workshop devoted to digital forensics in 2001, DFRWS continues to bring academics and practitioners together in an informal environment. As a non-profit, volunteer organization, DFRWS sponsors technical working groups, annual conferences and challenges to help drive the direction of research and development.

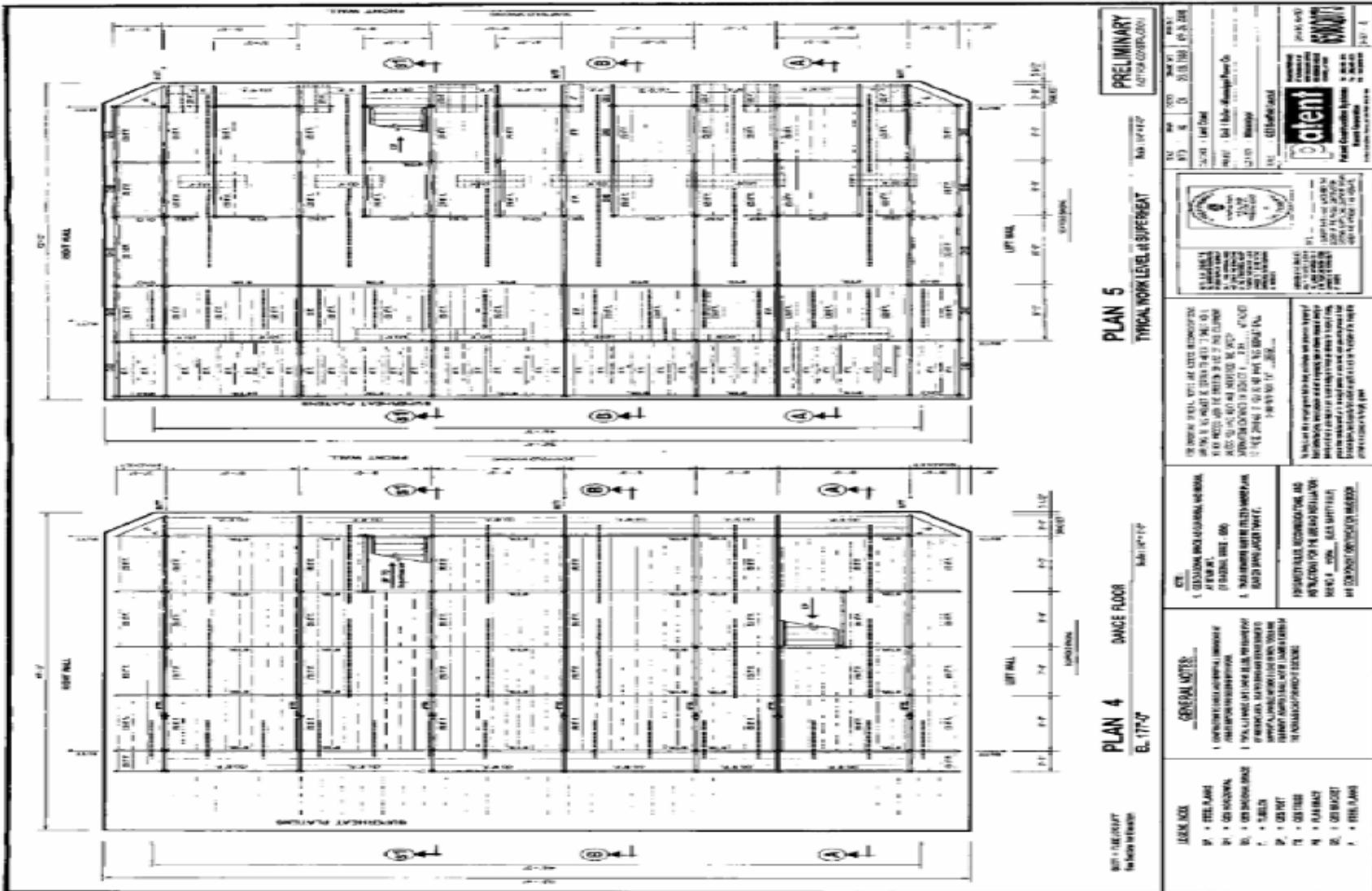
**<http://dfrws.org>**

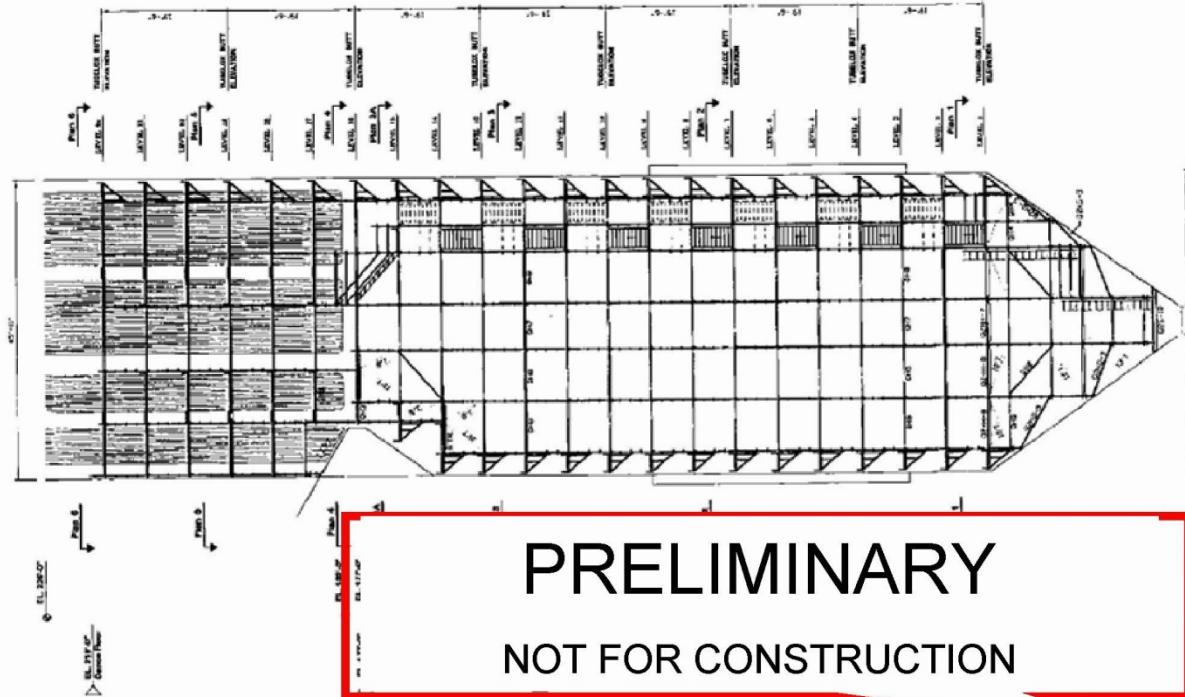
# eDiscovery Case Study

Victor Daniel Power Plant  
Boiler #2  
Escatawpa, MS  
November 4, 2011



PIC-PH-016301

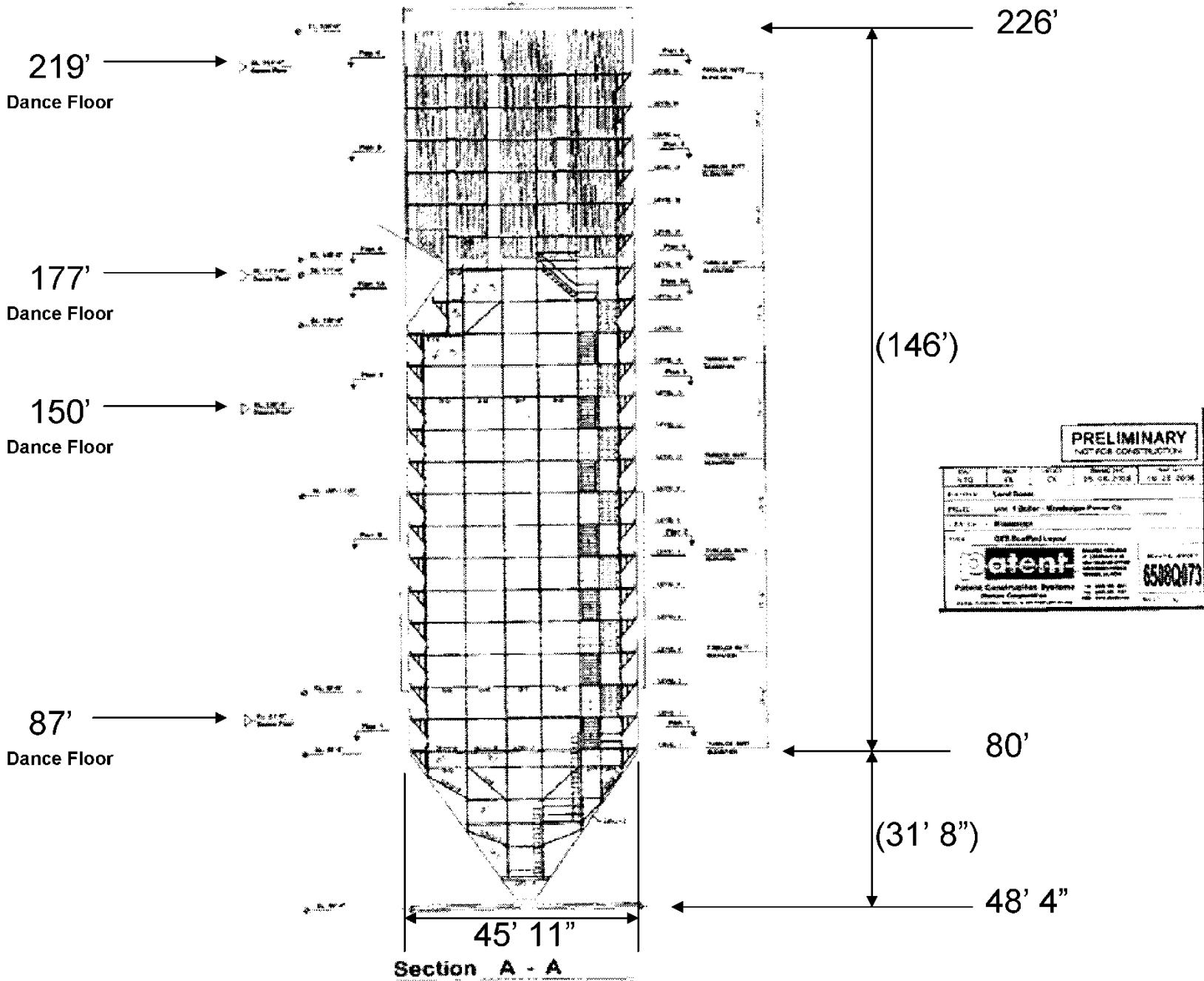




**PRELIMINARY  
NOT FOR CONSTRUCTION**

LEGEND INDEX	GENERAL NOTES	NOTE:	FOR INQUIRIES, GENERAL NOTES, AND ACCESSORIES, REFER TO "GEI'S SAFETY RULES" AND "GEI'S EQUIPMENT IDENTIFICATION HANDBOOK".	NOTICE OF LIABILITY: GEI'S EQUIPMENT IDENTIFICATION HANDBOOK AND THE "GEI'S SAFETY RULES" ARE THE PROPERTY OF GEI SYSTEMS, INC. AND ARE SUBJECT TO CERTAIN RESTRICTIONS AS TO USE. IF YOU DO NOT AGREE WITH THE EXCLUSION OR USE OF THIS EQUIPMENT UNLESS YOU HAVE READ AND UNDERSTOOD THE SAFETY INFORMATION CONTAINED IN THESE RULES, PLEASE ATTACH A COPY OF THESE RULES TO THIS SHEET OR CALL 1-800-766-5600, EXT. 5600.	NOTICE OF LIABILITY: GEI'S EQUIPMENT IDENTIFICATION HANDBOOK AND THE "GEI'S SAFETY RULES" ARE THE PROPERTY OF GEI SYSTEMS, INC. AND ARE SUBJECT TO CERTAIN RESTRICTIONS AS TO USE. IF YOU DO NOT AGREE WITH THE EXCLUSION OR USE OF THIS EQUIPMENT UNLESS YOU HAVE READ AND UNDERSTOOD THE SAFETY INFORMATION CONTAINED IN THESE RULES, PLEASE ATTACH A COPY OF THESE RULES TO THIS SHEET OR CALL 1-800-766-5600, EXT. 5600.	NOTICE OF LIABILITY: GEI'S EQUIPMENT IDENTIFICATION HANDBOOK AND THE "GEI'S SAFETY RULES" ARE THE PROPERTY OF GEI SYSTEMS, INC. AND ARE SUBJECT TO CERTAIN RESTRICTIONS AS TO USE. IF YOU DO NOT AGREE WITH THE EXCLUSION OR USE OF THIS EQUIPMENT UNLESS YOU HAVE READ AND UNDERSTOOD THE SAFETY INFORMATION CONTAINED IN THESE RULES, PLEASE ATTACH A COPY OF THESE RULES TO THIS SHEET OR CALL 1-800-766-5600, EXT. 5600.
SP. = STEEL PLANKING CH. = GEI'S HORIZONTAL GD. = GEI'S DIAGONAL BRACE T. = TUBULAR GP. = GEI'S POST TR. = GEI'S TRUSS PR. = PLATE BRACE GR. = GEN BRACKET P. = STEEL PLANKS	<b>GENERAL NOTES:</b> 1. CONTRACTOR TO CHECK AND VERIFY ALL DIMENSION DATA AGAINST BEFORE PROCEEDING WITH WORK. 2. TOTAL ALLOWABLE LIVE LOAD TO BE USED PER SQUARE FOOT OF WORKING AREA. SCAFFOLDING HAS BEEN DESIGNED TO SUPPORT A TOTAL ALLOWABLE LIVE LOAD OF 400 LBS. PER SQ.FT. AND EQUIPMENT BOARDFLGS SHALL NOT BE LOADED IN EXCISE OR THE WORKING LOAD FOR WHICH IT IS DESIGNED.	<b>NOTE:</b> 1. DIAGONAL BRACE AS GUARDRAIL AND MEASURES AT STAIR UNIT. (GEI'S DIAGONAL BRACE - GDI) 2. TRUSS MEMBERS MUST BE UTILIZED INSTEAD OF PLANK BEARING SPANS LARGER THAN 4'x4'.	<b>FOR INQUIRIES, GENERAL NOTES, AND ACCESSORIES, REFER TO "GEI'S SAFETY RULES" AND "GEI'S EQUIPMENT IDENTIFICATION HANDBOOK".</b>	<b>NOTICE OF LIABILITY:</b> GEI'S EQUIPMENT IDENTIFICATION HANDBOOK AND THE "GEI'S SAFETY RULES" ARE THE PROPERTY OF GEI SYSTEMS, INC. AND ARE SUBJECT TO CERTAIN RESTRICTIONS AS TO USE. IF YOU DO NOT AGREE WITH THE EXCLUSION OR USE OF THIS EQUIPMENT UNLESS YOU HAVE READ AND UNDERSTOOD THE SAFETY INFORMATION CONTAINED IN THESE RULES, PLEASE ATTACH A COPY OF THESE RULES TO THIS SHEET OR CALL 1-800-766-5600, EXT. 5600.	<b>NOTICE OF LIABILITY:</b> GEI'S EQUIPMENT IDENTIFICATION HANDBOOK AND THE "GEI'S SAFETY RULES" ARE THE PROPERTY OF GEI SYSTEMS, INC. AND ARE SUBJECT TO CERTAIN RESTRICTIONS AS TO USE. IF YOU DO NOT AGREE WITH THE EXCLUSION OR USE OF THIS EQUIPMENT UNLESS YOU HAVE READ AND UNDERSTOOD THE SAFETY INFORMATION CONTAINED IN THESE RULES, PLEASE ATTACH A COPY OF THESE RULES TO THIS SHEET OR CALL 1-800-766-5600, EXT. 5600.	<b>NOTICE OF LIABILITY:</b> GEI'S EQUIPMENT IDENTIFICATION HANDBOOK AND THE "GEI'S SAFETY RULES" ARE THE PROPERTY OF GEI SYSTEMS, INC. AND ARE SUBJECT TO CERTAIN RESTRICTIONS AS TO USE. IF YOU DO NOT AGREE WITH THE EXCLUSION OR USE OF THIS EQUIPMENT UNLESS YOU HAVE READ AND UNDERSTOOD THE SAFETY INFORMATION CONTAINED IN THESE RULES, PLEASE ATTACH A COPY OF THESE RULES TO THIS SHEET OR CALL 1-800-766-5600, EXT. 5600.

ESI0000196





PIC-PH-001068



PIC-PH-001042



PIC-PH-001040



PIC-PH-001022



PIC-PH-001095

November 11, 2008

Arrival at  
Victor Daniel Power Plant  
Escatawpa, MS



PIC-PH-003156

Video Monitoring of Scaffold Component Removal



PIC-PH-016322



BALCH & BINGHAM LLP

Atlanta • Chicago • Mississippi • Washington, DC

Paul J. Delcambre, Jr.  
(228) 214-0409

Attorneys and Counselors  
1110 Twenty Fifth Avenue  
P.O. Box 130 (39522)  
Oxford, Mississippi 38655  
(228) 864-5900  
(228) 864-8213 Fax  
[www.balch.com](http://www.balch.com)

(800) 204-8672 (direct line)  
[pdelcambre@balch.com](mailto:pdelcambre@balch.com)

November 17, 2008

**Re: LETTER AGREEMENT: RESTRICTIONS ON THE USE OF PHOTOGRAPHY,  
CONFIDENTIALITY AGREEMENT AND PROTOCOL**

To All:

My firm represents Mississippi Power Company and its affiliated owners of Plant Victor Daniel Generating Facility in the accident investigation regarding scaffold collapse at Unit # 2 boiler at Plant Daniel, located at 13201 Highway 63 Escatawpa, MS, on November 4, 2008 (the "Investigation").

This agreement is intended to govern the confidentiality, use and protocol of still photography, digital photographs, digital video and/or any other images (the "Photography") concerning the Investigation. This agreement governs and is to be executed by Mississippi Power Company, PIC Group, Inc., Land Coast Insulation, Inc. and Patent Construction Systems, their agents, experts, assigns, company representatives, attorneys, insurers, adjusters, contractors and/or vendors.

Regarding any Photography copyright owned by you, or which may later be owned by you by the taking of the Photography at Plant Daniel site at 13201 Highway 63 Escatawpa, MS (the "Site"), you hereby agree that the Photography will be used solely to support your Investigation and any claims, defenses and/or litigation concerning the incident that is the subject of the Investigation. You also agree that no cellular phones will be utilized during the Investigation to take any Photography of the Site. You further agree that such Photography will not be used, displayed, reproduced, posted publicly, including to the Internet or World Wide Web, for any other purpose and further that such Photography will not be transmitted by e-mail attachment to anyone or posted to any Internet site.

The Photography may contain certain proprietary and confidential information of the Site. The Photography is to be kept confidential and is to be governed by the following protocol: You agree to present yourself each morning (or otherwise upon arrival to the Site) to the designated PIC Safety Coordinator at the PIC trailer on Site. There, you will sign in and present any Photography equipment to be utilized during the inspection. At the conclusion of each work day, you agree to return to the PIC Safety Coordinator to copy/transfer/download all Photography to a master hard drive to be backed-up daily and maintained by PIC. Once copied/transferred/downloaded, your digital storage device/Photography device will be returned to your custody with the original Photography intact and in your possession, remaining on your device. You also agree to copy/transfer/download your camera and/or digital storage device of all Photography previously taken from the Site relating to the Investigation to the PIC Safety Coordinator's master hard drive. You understand that this agreement applies to your agents,

**Joint Protocol and Schedule for Selected Evidence Transportation, Storage,  
Non-Destructive Examination, and Selection of Specific Specimens for  
Further Analysis/Testing Under Separate Protocols**

**Regarding:  
November 4, 2008  
Scaffolding Collapse Unit No. 2 Boiler**

**Location:  
Mississippi Power Plant Daniel  
13201 Highway 63  
Escatawpa, Mississippi**

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It is the recommendation of Engineering Systems, Inc. that all components of the collapsed scaffold be retained and preserved unless written authorization from all known potential parties of interest is submitted regarding the disposition of the non-selected collapsed scaffold components. Decisions pertaining to the ultimate disposition of potential evidentiary items are the responsibility of the parties of interest.

The following outlines the scope of the Selected Evidence Transportation, Storage, Non-Destructive Examination and Specific Specimen Selection Phase of the analysis. Further analysis should be conducted jointly with potential parties of interest, so as to afford them the opportunity to evaluate the evidence in its present state and to participate in further examination efforts that might be destructive in nature.

Further analysis efforts are still subject to the conditions previously outlined in the following:

- November 14, 2008    "**Letter Agreement: Restrictions on the Use of Photography, Confidentiality Agreement and Protocol**"
- November 17, 2008    "**Consensus Protocol for Evidence Selection**"
- November 21, 2008    "**Consensus Protocol for Selected Evidence Retention**"
- December 1, 2008    "**Consensus Protocol for Non-Selected Evidence Retention**"

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**Joint Protocol for Examination of Selected Evidence**

Victor Daniel Power Plant  
DATE: December 30, 2008

1 of 13



PIC-PH-003381



Collected  
11/08/2008

Contained 36  
Personal  
Effects

Including 3 Cell  
Phones



PIC-PH-003387



## Evidence Chain of Custody

ESI File Number: 27986T

Description of Items:

S2A  
Cell Phone - AT&T LG w/ Battery

S2B  
Cell Phone - AT&T Samsung w/ Battery

S2C  
Cell Phone - Sprint Samsung w/ Battery

Concrete Fiber Boiler #2

MISSISSIPPI POWER PLANT VICTOR BAKER

Relinquished by: Matthew Cramdock  
(Print Name)

Representing: Engineering Systems Inc. / PIC  
(Company)

Matthew Cramdock  
(Signature)

Date: 11/24/08

To: Matthew Berry  
(Print Name)

Representing: Lateral Consulting Group  
(Company)

Matthew Berry  
(Signature)

Date: 11/24/08



PIC-PH-003419



PIC-PH-003420

November 14, 2008

Evidence found in garbage bags  
at Victor Daniel Power Plant  
Escatawpa, MS



PIC-PH-003532



PIC-PH-003548

LanCoust  
JOB# 10-3525  
DAY CREW

WEEK ENDING 11/09/2010  
FOREMAN: Dennis Sullivan

Division:  
Rebacy

Time Sheet  
TYPE OF WORK:  
Int. Paint.  
Marine

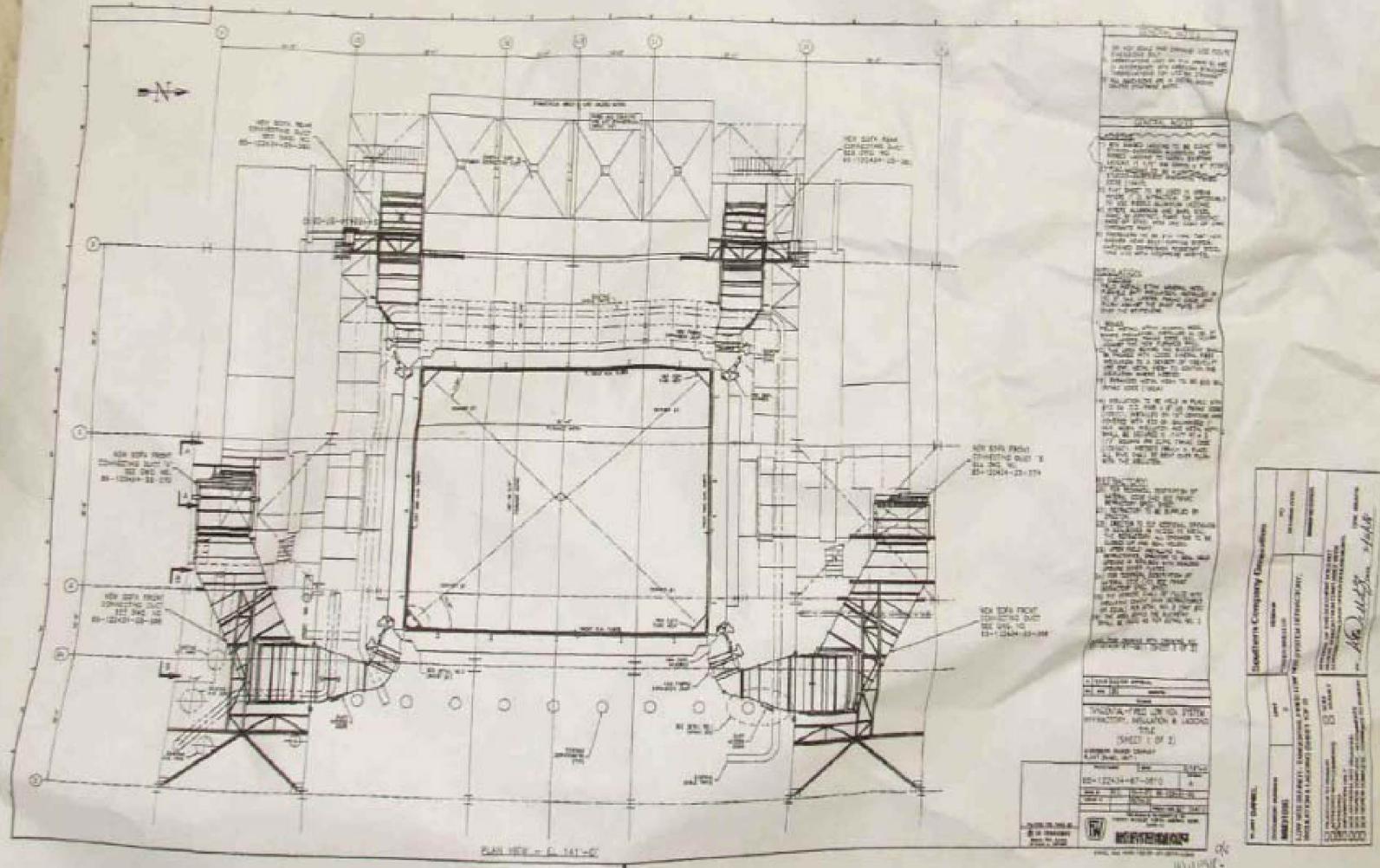
Tl.  
Pre-Prod.  
Reachack

Lump Sum:  
Scalor X  
Other X  
Other Adm.

Employee Name	Soc. Sec.	Rate	Pendient	Total	Mon		Tues		Wed.		Thur		Fri		Sat		Sun		Totals		Travel	
					ST	OT	ST	OT	ST	OT	ST	OT	ST	OT	ST	OT	ST	OT	ST	OT	ST	OT
Donald Sullivan		7	500	150	12.00	X	11.00	X	10.00	X	7.00	3.00	X	10.00	X	11.00	X	8.50	40.00	32.50		
Carlos Galvan		7	25.00	480	17.50	X	10.50		11.50		6.50	4.50	X	5.00	X			X	12.00	40.00	21.60	
Dolores Solis		5	14.00	120	11.50	X	2.00	X	X	X	2.00	X	X	X	X	X	X	X	15.50	X		
Pedro Galvan		7	14.00	150	11.50	X	2.00	X	X	X	2.00	X	X	X	X	X	X	X	15.50	X		
Robert Angel		7	16.00	150	15.50	X	2.00	X	X	X	2.00	X	X	X	X	X	X	X	15.50	X		
Gary Eagan		7	18.00	150	156.5	11.50	X	2.00	X	X	3.00	X	X	X	X	X	X	X	X	16.50	X	
Juan Cantu		7	18.00	150	15.50	X	2.00	X	X	X	2.00	X	X	X	X	X	X	X	X	16.50	X	
Miguel Aranza		7	16.00	150	11.50	X	2.00	X	X	X	2.00	X	X	X	X	X	X	X	X	15.50	X	
Izmael Zanale		7	18.00	100	11.50	X	2.00	X	X	X	2.00	X	X	X	X	X	X	X	X	15.50	X	
Robert Rusconi		7	16.00	150	15.50	X	2.00	X	X	X	2.00	X	X	X	X	X	X	X	X	17.50	X	
June Lopez		7	16.00	150	11.50	X	2.00	X	X	X	2.00	X	X	X	X	X	X	X	X	16.50	X	
Silvano Inzam		7	16.00	150	11.50	X	2.00	X	X	X	2.00	X	X	X	X	X	X	X	X	16.50	X	
Eric Galvan		7	18.00	150	11.50	X	2.00	X	X	X	2.00	X	X	X	X	X	X	X	X	16.50	X	
Felipe Medina		7	18.00	150	15.50	X	2.00	X	X	X	2.00	X	X	X	X	X	X	X	X	16.50	X	
Moses Ramos		7	16.00	n/a	11.50	X	2.00	X	X	X	2.00	X	X	X	X	X	X	X	X	19.50	X	
Gerebeco Pacheco		7	14.00	n/a	15.50	X	2.00	X	X	X	2.00	X	X	X	X	X	X	X	X	15.50	X	
William J. Almodovar		7	18.00	n/a	11.50	X	2.00	X	X	X	2.00	X	X	X	X	X	X	X	X	19.50	X	
Nathaniel Delgado		7	16.00	n/a	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	15.50	X	
Daniel A. Rivera		7	14.00	n/a	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Jesus Victor Hart		7	16.00	150	15.50	X	2.00	X	X	X	2.00	X	X	X	X	X	X	X	X	19.50	X	
Aristides A. Capo		7	18.00	150	11.50	X	2.00	X	X	X	2.00	X	X	X	X	X	X	X	X	15.50	X	
Byron Thomas		7	14.00	n/a	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	15.50	X	
Timothy Caffey		7	12.00	n/a	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Amartinez Carson		7	10.00	n/a	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Cesar A. Cruz		7	18.00	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Francisco Posada		7	14.00	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Manuel Salgado		7	14.00	100	+1.50	X	2.00	X	X	X	X	X	X	X	X	X	X	X	X	13.50	X	
Tracy James		7	19.50	350	13.00	X	13.00	X	13.00		1.00	12.00		12.00	X	X	X	X	40.00	24.00		
					273.50																	



PIC-PH-003606



Schematic Drawing Information	
Project Name:	Residence
Architect:	John Doe
Structural Engineer:	Mary Smith
Building Type:	Single Family Home
Address:	123 Main Street, Anytown, USA
Date:	01/01/2024
Sheet Number:	1 of 2
Scale:	1:100
Comments:	Hand-drawn sketch for initial design phase.

*John Doe, Mary Smith*

PIC-PH-003617

Daily Sign in & out  
incomplete.

Klesa Jeneroz Rodriguez

Gloss Funeral Home  
Phil Gelmer ~~200~~ 251-689-1272



# SCAFFOLD COMPONENTS

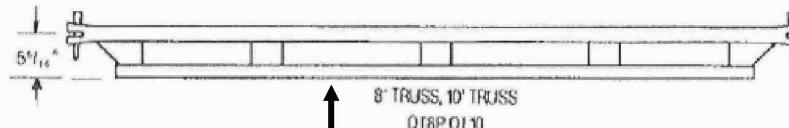
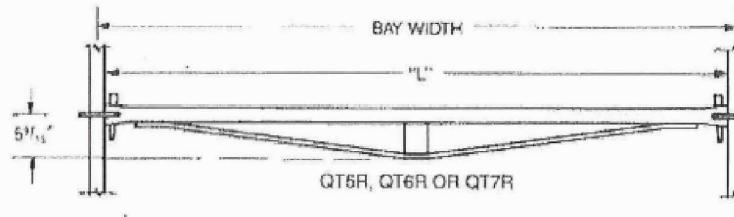
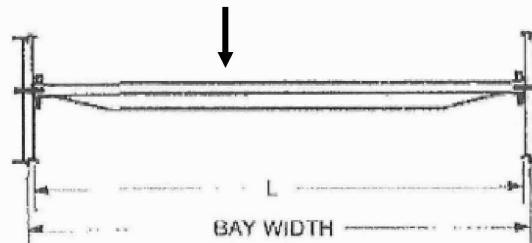


PLATE TRUSS

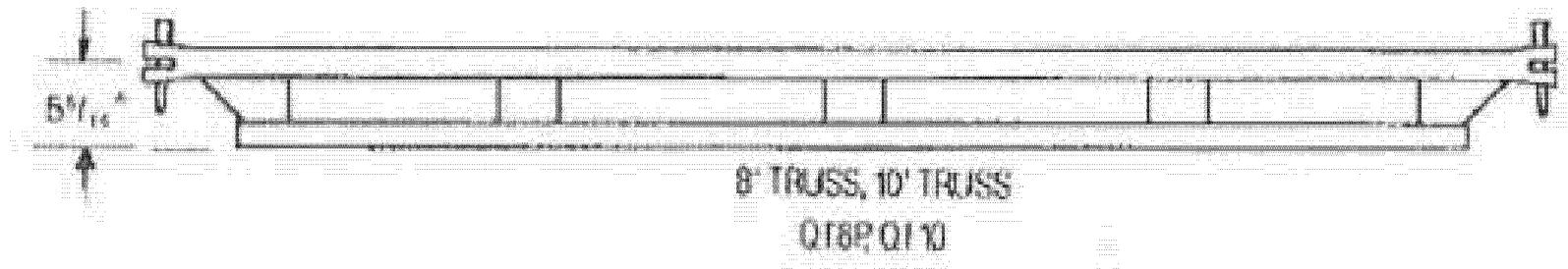


HEAVY HORIZONTAL



"L"	PART NO.	BAY WIDTH	WEIGHT
4'10 7/32" [1.48M]	Q2HH-5	5'0" [1.52M]	24 LBS. [10.89KG]
5'10 7/32" [1.78M]	Q2HH-6	6'0" [1.83M]	29 LBS. [13.15KG]
6'10 7/32" [2.09M]	Q2HH-7	7'0" [2.13M]	35 LBS. [15.88KG]
7'10 7/32" [2.39M]	Q2HH-8	8'0" [2.44M]	40 LBS. [18.14KG]

## PLATE TRUSS

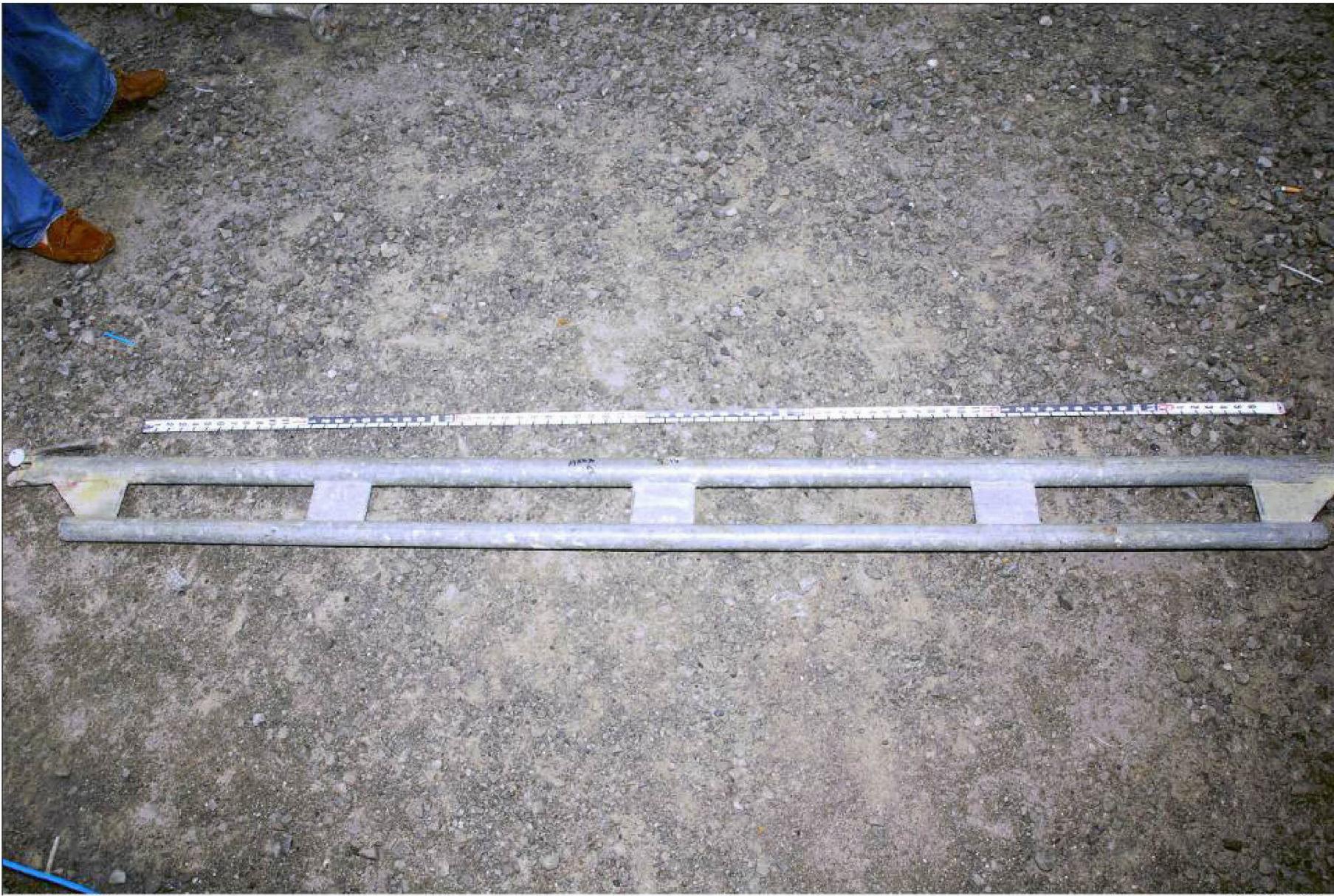




PIC-PH-003360



PIC-PH-007027



PIC-PH-012803

**SAFETY RULES 910R3**  
**SAFE ALLOWABLE LOADS FOR**  
**BEARERS AND TRUSSES**

QES PART NUMBER	DESCRIPTION	MAXIMUM UNIFORM LOAD (LBS./FT.)	ALLOWABLE CONCENTRATED LOAD AT CENTER (LBS.)	ALLOWABLE BEARER DESIGN LOAD IN #/SQ. FT.			
				6' RUNNER	7' RUNNER	8' RUNNER	10' RUNNER
QH3	3' BEARER	533	809	88	78	67	53
QH4	4' BEARER	300	600	50	43	38	30
QH5	5' BEARER	182	480	32	27	24	19
QT5R	5' ROD TRUSS	460	1125	75	64	56	45
QT6R	6' ROD TRUSS	312	940	52	45	39	31
QT7R	7' ROD TRUSS	243	850	41	35	30	24
QT8P	8' PL. TRUSS	384	1500	64	56	48	38
QT10	10' PL. TRUSS	195	980	39	30	25	19
QT16	16' TRUSS	177	1930	30	25	22	16
QT20	20' TRUSS	130	1834	22	18	16	13



3', 4', 5' BEARER



5', 6', 7' ROD TRUSS



8', 10' PLATE TRUSS



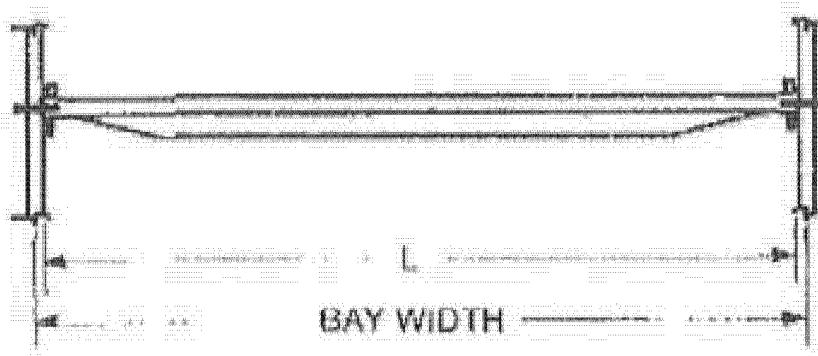
16', 20' TRUSS

**DO NOT EXCEED THE ALLOWABLE LOADINGS SHOWN IN THE ABOVE TABLES**

006

5

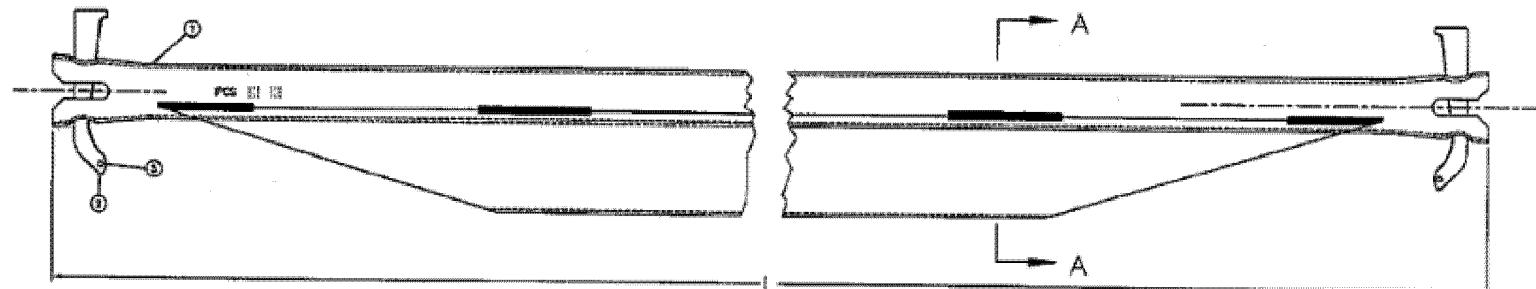
## **HEAVY HORIZONTAL**



"L"	PART NO.	BAY WIDTH	WEIGHT
4'-10 <sup>7</sup> / <sub>32</sub> " [1.48M]	Q2HH-5	5'-0" [1.52M]	24 LBS. (10.89KG)
5'-10 <sup>7</sup> / <sub>32</sub> " [1.78M]	Q2HH-6	6'-0" [1.83M]	29 LBS. (13.15KG)
6'-10 <sup>7</sup> / <sub>32</sub> " [2.09M]	Q2HH-7	7'-0" [2.13M]	35 LBS. (15.88KG)
7'-10 <sup>7</sup> / <sub>32</sub> " [2.39M]	Q2HH-8	8'-0" [2.44M]	40 LBS. (18.14KG)

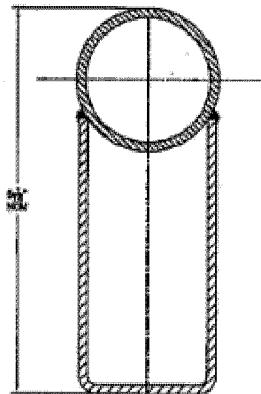
## REVISIONS

REV.	DESCRIPTION	DATE	APPROVED
F	EXPLANATION: DRAWING REVISED TO INCLUDE A HOLE IN THE HORIZONTAL TUBE FOR THE WIRE. THIS HOLE IS LOCATED ON THE LOWER SURFACE OF THE HORIZONTAL TUBE.	1-26-68	



SCALE: 3A

PART NUMBER	PART Q/C	TYPE	L LENGTH	ASSEMBLY WEIGHT	COLOR CODE
02HHX	4'-0"	WELDMENT	3'-10 7/32"	16	(0.92)
02-HH	8'-0"	WELDMENT	4'-10 7/32"	24	(16.00)
02-HD	4'-0"	WELDMENT	5'-10 7/32"	29	(15.18)
02-HZ	7'-0"	WELDMENT	6'-10 7/32"	36	(14.00)
02HH6	8'-0"	WELDMENT	7'-10 7/32"	40	(14.14)
02-HB	6'-0"	WELDMENT	8'-10 7/32"	48	(20.44)
02HH10	10'-0"	WELDMENT	9'-10 7/32"	80	(22.68)



010

SECTION A-A  
SCALE: FULL

THIS DRAWING IS MADE WITH THE EXPRESS UNDERSTANDING THAT THE INFORMATION CONTAINED HEREIN CONSTITUTES THE PROPERTY OF THE COMPANY AND IS NOT TO BE COPIED OR REPRODUCED, EXCEPT BY AUTHORITY OF THE COMPANY, WHICH MAY BE GRANTED IN WRITING OR IN THE FORM OF A CONTRACT. THIS DRAWING IS THE PROPERTY OF THE COMPANY AND IS NOT TO BE USED FOR THE PURPOSE OF MANUFACTURE, DESIGN, OR OTHER PURPOSES EXCEPT AS AUTHORIZED BY THE COMPANY. ANYONE WHO MAKES AN UNAUTHORIZED USE OF THIS DRAWING, WHETHER DIRECTLY OR INDIRECTLY, WILL BE SUBJECT TO THE PENALTIES PROVIDED FOR IN THE COMPANY'S TRADE SECRET AGREEMENT. THIS DRAWING IS THE PROPERTY OF THE COMPANY AND IS NOT TO BE COPIED OR REPRODUCED, EXCEPT BY AUTHORITY OF THE COMPANY. THIS DRAWING IS THE PROPERTY OF THE COMPANY AND IS NOT TO BE USED FOR THE PURPOSE OF MANUFACTURE, DESIGN, OR OTHER PURPOSES EXCEPT AS AUTHORIZED BY THE COMPANY. ANYONE WHO MAKES AN UNAUTHORIZED USE OF THIS DRAWING, WHETHER DIRECTLY OR INDIRECTLY, WILL BE SUBJECT TO THE PENALTIES PROVIDED FOR IN THE COMPANY'S TRADE SECRET AGREEMENT.

NEXT ASSY. USED ON  
APPLICATION

UNLESS OTHERWISE SPECIFIED DIMENSIONS ARE IN INCHES  
TOLERANCES ON:  
FRACTION:  $0-24'' \pm 1/32''$   
 $24''$  AND UP  $\pm 1/16''$   
DECIMALS:  $\pm .10\%$   
ANGLES:  $\pm 1^\circ - 0'$   
MATERIAL: APPROVED

3	2	INVEST. O/D X 1/2" LONG ROUND ROAD STEEL, GALVANIZED		
2	2	LOCKING NUT		
1	1	HORIZONTAL TUBE WELDMENT		
NO.	QTY.	DESCRIPTION		
CONTRACT NO.  				
PREPARED E.A.S. 1-28-68				
CHECKED				
APPROVED				
HEAVY HORIZONTAL ASSEMBLY O.E.S.				
SIZE	CODE	ITEM NO.	DRAWING NO.	REV.
C	45826	D2HHX	F	
SCALE: 1/4" = 1'-0"				
UNIT WEIGHT				
SEE TABLE				
SHEET 1 OF 1				



PIC-PH-003365



PIC-PH-003808

PSQ2HH-8  
QES 8' HEAVY HORIZONTAL



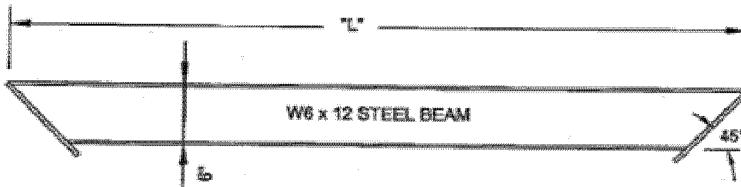
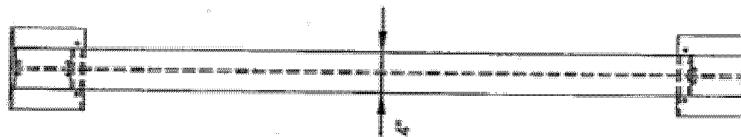
7 54824 89610

01/22/85 8114

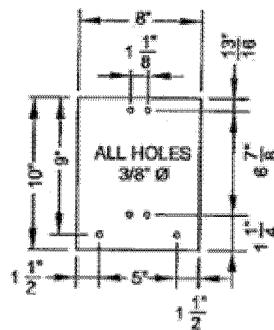
made in the USA



Title: ENGINEERING SCAFFOLDING MANUAL	Issue Date: 06/30/05	By: D. Alderman
Section 3: COMPONENTS	Item: 3.2.3 QES BOILER ACCESS.	Page 6



Q.E.S. PART NO.	LENGTH "L"	WEIGHT
Q2S-6	6' - 0"	84.5 lbs.
Q2S-10	10' - 0"	134.0 lbs.



END PLATE

SUPPORT BEAMS



PIC-PH-010851

# Lay Down Yard at Victor Daniel Power Plant

Tagging of Evidence

NOVEMBER 4, 2008 SCAFFOLD COLLAPSE  
EVIDENCE LAYDOWN YARD DIAGRAM

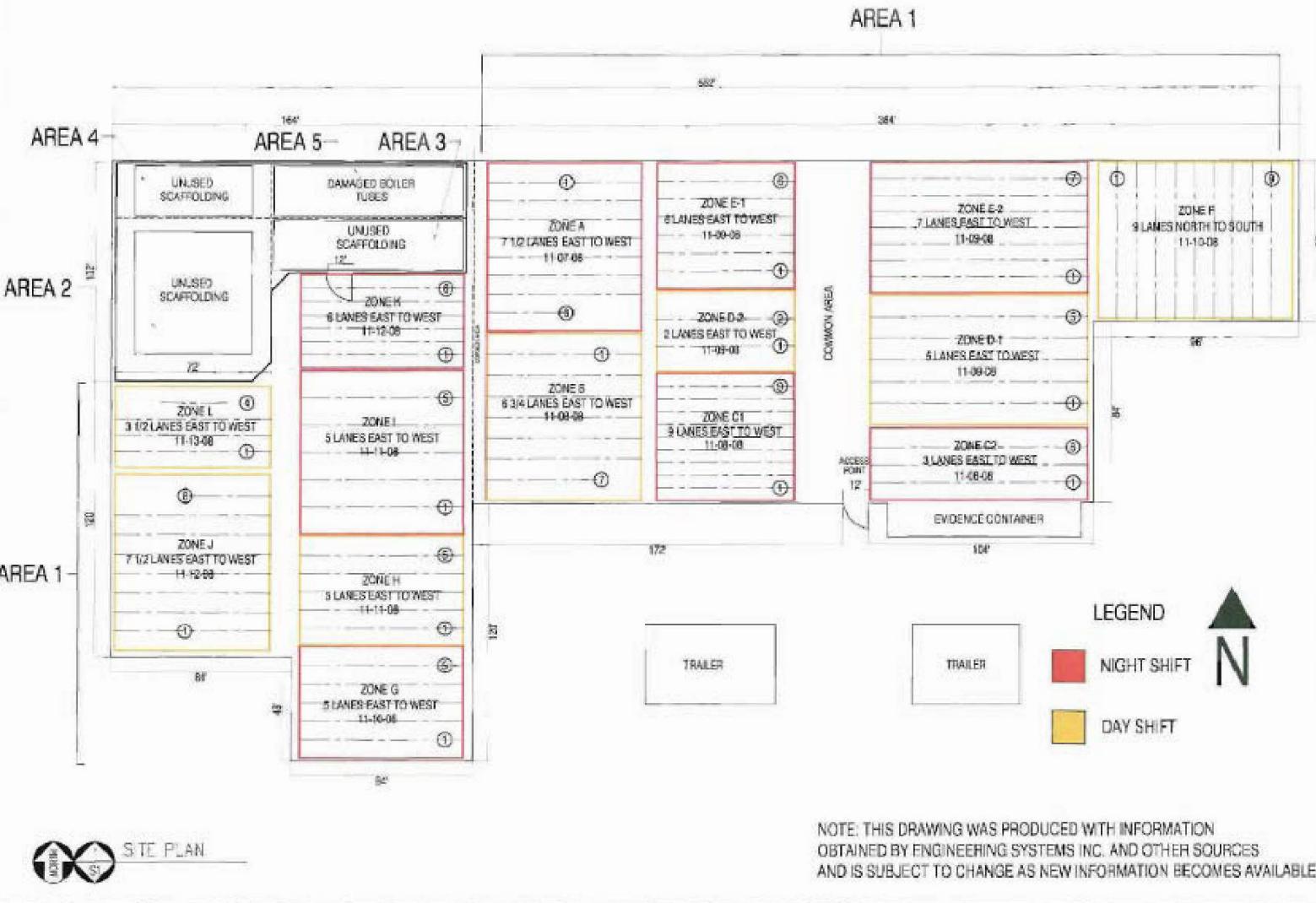
ESI FILE # 379817  
DATE: 04 DEC 2008

DRAWN BY: SJS  
REVIEWED: JDS

Engineering Systems  
Inc.

55 Exchange Avenue  
Alameda, CA 94501  
(510) 529-5500

S1



SITE PLAN

ES10000107



PIC-PH-009525



PIC-PH-009526



PIC-PH-009527



PIC-PH-009530

AREA 1  
ZONE K  
LANE 5

**BLUE**

PIC

E.S.I.

P.I.I.

**GREEN**

PATENT

EXPONENT

**RED**

LAND COAST

M.E.I.

F.S.C.

**YELLOW**

OSHA

**ORANGE**

MPC

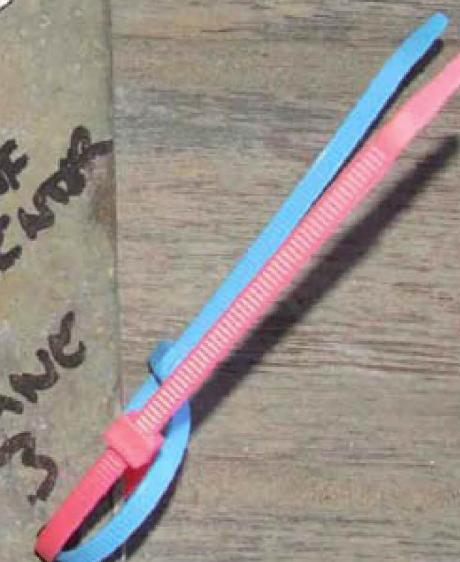
2  
1  
1/2 FEET

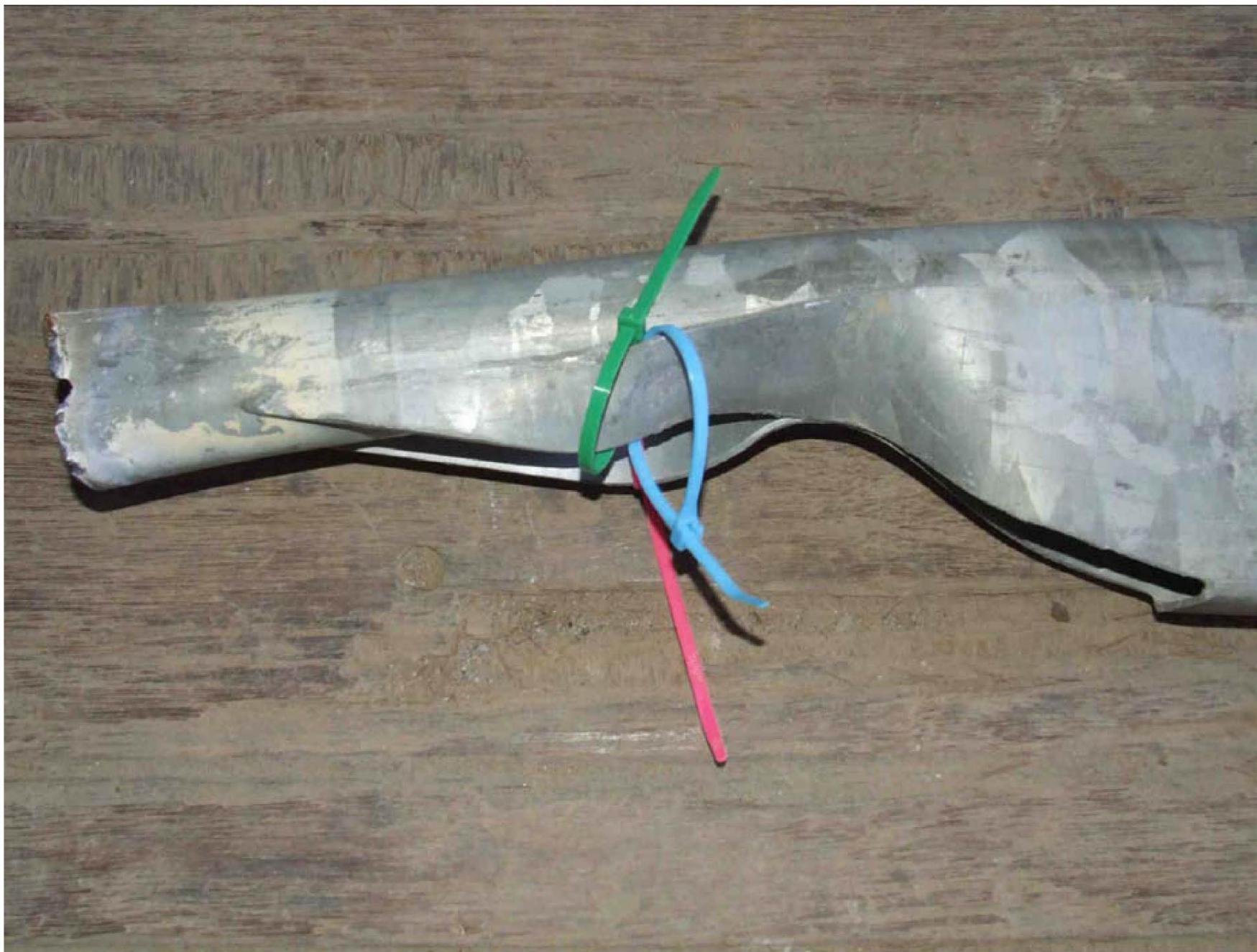
312

C. of  
Curve

Line

Area Zone #





PIC-PH-006053

February 2, 2009

Portable Storage Container  
Departed

Victor Daniel Power Plant  
Escatawpa, MS





PIC NDT00004



PIC NDT000009



10770 Imperial Valley Dr.  
Suite 130  
Houston, Texas 77038



Phone: (281) 445-0850  
Fax: (281) 446-0097  
ESI-website.com

### Evidence Transfer Form

ESI Project Number:

27986 T

Evidence Description:

40 FT CONEX CONTAINER, CONTAINING SCAFFOLDING COMPONENTS  
AND OTHER ITEMS  
SHIPPED AS #1 THRU L40 RELATED TO SCAFFOLD COLLAPSE

Relinquished by:

PTC Group Gerald Berry

Representing:

PTC Group

Signature

Gerald J Berry

Date:

02-02-09

Relinquished to:

JAMES L. DAUGHERTY 4614

Representing

ENGINEERING SYSTEMS INC.

Signature

James L. Daugherty

Date

Feb 2, 2009

Providing Clear Answers  
Through Imaging and Multidisciplinary Expertise

COLLEGEVILLE

FLORIDA

ILLINOIS

KANSAS

MONTANA

TEXAS

ESI0000108



PIC\_NDT000104

February 3, 2009

Portable Storage Container  
Arrived at ESI's Test and Storage  
Facility  
Kingwood, Texas



PIC NDT000128



PIC NDT000131



PIC NDT000219



PIC NDT000224

# February 3-6, 2009

Evidence was removed from storage container, sorted and placed in secured storage within ESI facilities



PIC NDT000504



PIC NDT000505

# 655 Evidentiary Items



## 36 Personal Items (3 Cell Phones)

March 2, 2009

## 4 Pieces Preliminary Drawings

## 226 Documentary Items

# February 9-13, 2009

Visual, dimensional, and photographic documentation of evidentiary items was conducted at ESI facilities



PIC NDT000876



2009/02/04 08:11:52

PIC NDT000248

## Interim Certification Document

Part Description: Digital Thermometer

Calibration Date: 04/15/04

Serial#: C13-09-05-03396

Single Point X Sigma:

C12-02-01-244mV (11.0196)

Certified:

C0329638817

Linear Displacement X Sigma:

C12-02-01-Scalem (11.0196)

Ambient Temperature: 22°C ± 3°C

### Measurement Standards Traceability

Bartec XX

Asset Number: C26

Calibration Date: 04/15/04

\*SI Traceability: NPL-LLG1514-0001

10mm Step Gauge, Mitutoyo

Asset Number: A37

Calibration Date: 08/2004

\*SI Traceability: NIST-821067-15-02

Code No.: 015-744

Measuring range: 1.5m

\*The stated values have been determined with a known traceability in the international System of Units (SI) through a National Measurement Institute (NMI) or through an ISO/IEC 17025 accredited Laboratory. Expanded measurement uncertainty is 0.5% <math>\pm 0.5</math> mm, where the measured value is stated, uncertainty is expressed at approximately the 95% Level of Confidence using <math>t=2</math>

### Certification Results

A basic four quadrant certification procedure was used by FARO America and comprised of 2 vertical level single point repeatability test in

PASSED

4 quadrants with 2 repeats from 4 directions

PASSED

Level: Single Test in 4 quadrants, 2 repetitions per quadrant

PASSED

Level: 3 position free fall test in 4 quadrants

Calibration and certification conformed to procedures developed in accordance with ASME B89.4.22-2004.

### Instrument condition as received

Reconditioned

### Instrument condition outgoing

Within specifications

Technician: *Dave Peltz*

Date: 4/15/04

This certificate shall not be reproduced, except in full,

without permission of FARO Technologies, Inc.

The contents of this certificate remain the sole property of FARO Technologies, Inc.

FARO Technologies, Inc.  
PH1: 1-800-735-2771  
PH2: 407-333-9911  
FAX: 407-333-6056

125 Technology Park  
Lake Mary, FL 32746  
USA



LABORATORY  
ACCREDITATION  
BUREAU  
ISO/IEC 17025 Accredited

**FARO**

Page 1 of 16

2009/02/04 11:55:21

PIC NDT000388

February 13, 2009

Evidence transported to  
Anderson & Associates  
Houston, Texas

GH 0619 J





## Evidence Chain of Custody

ESI File Number: 2798ET

Description of Items: See spreadsheet attached (2 pages)

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Relinquished by: Dennis Scardino  
(Print Name)

Representing: Engineering Systems Inc.  
(Company)



Date: 2/13/09

To: James Baile  
(Print Name)

Representing: Anderson & Associates  
(Company)



Date: 2/13/09

February 16-20, 2009

Non-destructive testing was  
performed at Anderson &  
Associates



PIC NDT002417



PIC NDT002425

March 2, 2009

Evidence Transported from  
Anderson to ESI  
Kingwood, Texas





16770 Imperial Valley Dr.  
Suite 150  
Houston, Texas 77060



Phone: (281) 448-6060  
Fax: (281) 448-6062  
esi-website.com

#### EVIDENCE CHAIN OF CUSTODY

ESI Project No.:	27986T			Party:	
Date of Incident:	11/04/2008			Location:	Moss Point, MS.
Client Name:	A. J. Krouse				
Company:	Frilot L.L.P.			File Name:	
Street:	1100 Poydras Street, Suite 3600			File No.:	
City:	New Orleans	State	TX	Zip	70163
Telephone:	504-599-8012	Faxsimile:	599-8116	Email:	AKrouse@frilot.com
Date Evidence	<input checked="" type="checkbox"/> Collected		<input type="checkbox"/> Received	03/02/09	
Evidence	<input checked="" type="checkbox"/> Collected by		<input type="checkbox"/> Received by	James Daughenbaugh / Sabrina Lewis of ESI	
Evidence	<input checked="" type="checkbox"/> Transported by		<input type="checkbox"/> Received from	James Daughenbaugh / Sabrina Lewis of ESI	

List of Specimens		Location Collected		
1.	104 various pieces of scaffolding	Anderson & Associates, Inc.		
2.	(see full list attached)	919 F.M. Road 1939		
3.		Houston, TX, 77034-5425		
4.		(281) 481-5840		
5.				
6.				
7.				
8.				

Date In	Date Out	Disposition	Name of Individual	Company	Signature
02/13/09	03/02/09	<i>A.J. Krouse</i>	<i>James Daughenbaugh</i>	<i>Anderson A. Inc.</i>	

*RECEIVED 3-2-09 James Daughenbaugh ESI*

Providing Clear Answers  
Through Insights and Multidisciplinary Excellence

COLORADO

FLORIDA

ILLINOIS

LOUISIANA

MISSOURI

TEXAS

ESI0000125

## Photography & Videography

PIC	LandCoast	Patent
15,845 Photos 61 Videos	1281 Photos	884 Photos 4 Videos

Anderson	Mississippi Power	Plaintiff
1839 Photos 26 SEM	367 Photos 3 Videos	9 Photos

Totals  
20,225 Photos  
68 Videos  
26 SEM