

# FLINT WATER CLASS ACTION DAMAGE INVENTORY

## General Instructions

**Warning: If you do not preserve evidence or if you destroy it, you may not be able to recover damages in this case. This is a legal requirement.**

**Your legal team will assist you in preserving the evidence you will need to prove your case. Our staff will guide you through the steps you will need to follow.** There are rules of evidence which govern which information may be used to prove your case. All photographs, videos, emails, text messages, water samples and documents which relate to your case must be preserved and made available to the attorneys for the parties you are suing.

You **MUST** take reasonable steps to preserve the digital devices which took the photographs or videos or contain the text messages or emails or the digital devices which have been used to store the digital material. This means that if this digital information is on your cell phone and you purchase a new, you must preserve the old phone. Your legal team will help you with this legal requirement.

Digital photographs, videos, text messages and emails on your cell phone should be loaded to a computer and then loaded onto a disc or thumb drive in order to properly preserve the evidence. If this digital material is on your computer it should be loaded onto a thumb drive or disc. Water samples should be labeled with the date, person drawing the sample, source of the sample and stored in a safe area. Important documents should be photocopied or scanned into a computer for preservation. These are legal requirements.

Please wait for instructions from your Legal Team before sending documents, photographs or other material about your case.

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<b>Personal Injury</b>	<b>Photographs or Videos</b>	<b>Records and Evidence Preservation</b>
<p>Visible physical injury to you or family members such as hair loss, rash, changes in skin or eye color</p>	<p>If you have taken photographs or videos they should be preserved now. You should estimate the dates of all past photographs or videos. The contact information of any photographers should be preserved. If in a digital format, the photographs or videos should be loaded on disc or thumb drive. When asked to do so, a copy of the photographs/videos should be delivered to Class Counsel with all of the above information about the how the photographs/videos were taken, when taken and by whom. The same procedure should be used for future photographs.</p>	<p>The digital devices that took the photographs/videos or the digital storage devices where the photographs/videos were stored should be preserved if possible. If you have not recorded the approximate dates when these conditions appeared, now would be an excellent time for you to record your best memory of when the symptoms appeared, how the symptoms relate to toxic water exposure, how long the symptoms remained and what treatments if any you received for the symptoms. All future symptoms should be handled in the same way. The nature and dates of all relevant treatments, medical provider contact information and medications prescribed should be recorded and shared with Class Counsel.</p>
<p>Non-visible injury to you or family members such as diarrhea, stomach disorders, mental problems, sleep, fatigue, breathing problems, swelling of hands and feet, coldness, sweating, eating and swallow disorders.</p>	<p>Photographs if any should be handled as described above.</p>	<p>You should make a record of the symptoms as described above. The nature and dates of all relevant treatments, medical provider contact information, medications prescribed should be recorded and shared with Class Counsel.</p>
<p>Lead or copper or other toxins in your blood or blood of family members</p>	<p><b>If you have not had your blood or the blood of your family members tested for lead, copper or other toxins, you should do so immediately.</b></p>	<p>Copies of all blood tests should be preserved. It is important that you identify blood level tests which may have been performed on you or your family members before exposure to the toxic water. If you do not have these records, please let Class Counsel</p>

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		know of the existence of these “before” records. These records should be shared with Class Counsel.
Psychological injuries to you and family members		The nature and dates of all relevant treatments, medical provider contact information, medications prescribed should be recorded and shared with Class Counsel.
Aggravation of medical conditions		Secure medical records or inform Class Counsel where the records can be obtained.

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<b>Economic Injury</b>	<b>Photographs or Videos</b>	<b>Records and Evidence Preservation</b>
Tests performed on water service for toxins/lead/copper	If you have photographs/videos of past or future testing, provide them to Class Counsel with a description of the scenes when requested to so.	Past, current and future test results should be preserved and shared with Class Counsel when requested. All steps taken by you or your agent to preserve a water sample should be documented step by step. Past water sample testing steps should be reconstructed now to the best of your ability.
Irrevocable damage to water service lines and replacement costs	If water service lines have been replaced, secure photographs/videos of damaged water lines carefully noting dates and contact information for individuals shown in photographs.	Preserve the damaged water lines in a safe place. Record all details regarding costs of replacement, contact information for contractor and other relevant information. You should secure a plumber's opinion as to the serviceability of your water line. Most plumbers have video equipment which will snake into your lines for assessment.
Impairment of water service lines and replacement costs		You should secure a plumber's opinion as to the serviceability of your water line. Most plumbers have video equipment which will snake into your lines for assessment.
Loss of property value	The condition of your home should be captured in photographs/videos so that this evidence can support a real estate appraisal. The dates of past photographs should be recorded. This evidence should be preserved by you.	You can secure a real estate appraisal from a qualified real estate broker.
Loss of family pets or cost of veterinarian treatments	Photographs/videos of your pet before and after exposure to the toxic water should be preserved.	Record the nature of and dates of all past and future symptoms of your pet reasonably related to the exposure of toxic water.
Cost of bottled water		Estimate past consumption and

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<b>Economic Injury</b>	<b>Photographs or Videos</b>	<b>Records and Evidence Preservation</b>
		keep record of current and future consumption.
Cost of hotel accommodations		Estimate dates and cost of past accommodations with reasons and identity of family member using the hotel. Keep record of future accommodation costs.
Cost of plumbing repairs		All plumber repair invoices reasonably related to the toxic water should be collected and maintained in the future.
Refund of paid water bills and cancellation of unpaid water bill obligations		Collect and retain all water bills and payment records from May 1, 2014 to present and into the future.
Lost time from work to deal with water issues		Record all missed time from work, lost pay and the reasons for missing time from work.
Medical expenses for you and family members	This could include mileage to and from the doctor/hospital, babysitter expenses, co-pays, deductibles and over the counter prescriptions.	Preserve all records. Record the nature of and dates of all past and future treatments reasonably related to the exposure of toxic water.