

experts had been conducting, and has thereby further delayed defendants' discovery.

2. Plaintiffs' Third Amended Complaint, as well as recent report and testimony by its' medical experts, alleges that the plaintiffs manifest a broad range of physical injuries which resulted from exposure to trichloroethylene, perchloroethylene, 1,2 transdichloroethylene, and 1,1,1 trichloroethane in their drinking water supplied by Wells G and H.

3. These allegations place in controversy the physical conditions of the plaintiffs and establish a good cause for these examinations.

4. The initial physical examination must proceed immediately according to the protocol and schedule to insure that:

- a) The broad range of injuries alleged is thoroughly evaluated,
- b) defendants' medical experts have sufficient time to review all findings and determine whether additional testing is necessary to discern the nature and causes of the plaintiffs' alleged physical complaints, and
- c) the complete examination and testing is completed before the period for discovery ends in two weeks.

PROTOCOL

Complete medical history
Complete occupational exposure history
Thorough physical examination, including evaluation of:

- general appearance
- head
- eyes
- ears
- nose
- mouth/throat
- neck
- chest
- heart
- breasts
- abdomen
- back
- rectal for persons over 40
- skin
- neurological
- extremities

Furthermore, consistent with good medical practice, the examinations may also include:

The drawing of blood for the following analyses:

- complete blood count
- SMA 25 (standard screens for body function)

Urinalysis
Electrocardiogram
Chest X-ray
Scratch tests
Sinus film
Echo cardiogram

The defendants reserve the right to conduct at a later date further ancillary, noninvasive tests -- e.g., additional blood work, or additional cardiovascular testing -- should the doctors deem it warranted based upon their review of the initial history, the physical examination, the results of any laboratory tests noted above and ordered by them, or the results of examinations and tests conducted by plaintiffs' experts but produced to defendants so recently as to deprive defendants' doctors of adequate time to review them.