

### EXHIBIT A – List of Requested Documents

1. All documents or communications related to your work on, or comments regarding, the ATHEM-2 project, including correspondence with the Austrian Workers' Compensation Board;
2. All documents or communications regarding articles related to ATHEM-2, including correspondence with H. Al-Serori, M. Kundi, F. Ferk, M. Misik, A. Nersesyan, M. Murbach, TT Lah, or S. Knasmuller regarding the evaluation of the potential of mobile phone specific electromagnetic fields to produce micronuclei in human glioblastoma cell lines;
3. All correspondence and materials regarding the EUROPAEM EMF Guideline for the Prevention, Diagnosis and Treatment of EMF-Related Health Problems and Illnesses, including but not limited to all data, drafts, analyses, protocols, conflict disclosures, and correspondence. This request includes correspondence and materials regarding both published versions of the paper, and the circumstances associated with the retraction of the first version and publication of the second version;
4. All documents and correspondence relating to the "Thank You for Calling" movie;
5. All correspondence with Klaus Scheidsteger;
6. All correspondence regarding the Bioinitiative Reports and all correspondence with any member of the Bioinitiative Working Group;
7. All correspondence with any representative of the Environmental Health Trust since February 1, 2013;
8. All correspondence with George Carlo relating to any topic relevant to this litigation since February 1, 2013;
9. All correspondence with Devra Davis relating to any topic relevant to this litigation since February 1, 2013;
10. All correspondence with Joel Moskowitz relating to any topic relevant to this litigation since February 1, 2013;
11. Any scientific materials, data, documents, information and/or materials relied upon or considered by you in forming the opinions you will offer in this litigation (other than papers in the publicly-available peer-reviewed literature that you cited in either of your reports, and other than materials you have already produced in this litigation);

12. All materials from presentations, lectures, meetings, or speeches prepared by you concerning the association between alleged health effects and the use of cellular phones;

13. All documents or correspondence regarding the investigation into alleged scientific misconduct in connection with your work on ATHEM-1;

14. Your entire file for this litigation to the extent not already produced;

15. Any exhibit you intend to present at the *Daubert* hearing to the extent not already produced;

16. All correspondence with or regarding Dr. Vini Gautam Khurana, Dr. Shira Kramer, Dr. Om Gandhi, Dr. Laura Plunkett, Dr. Dimitris Panagopoulos, Dr. Igor Belyaev, Dr. Abraham Liboff, or Dr. Michael Kundi since February 1, 2013;

17. All materials from presentations, lectures, meetings, or speeches prepared by you concerning the association between alleged health effects and the use of cellular phones that you have not already produced in this litigation;

18. All transcripts, notes, or presentation materials prepared in connection with any testimony you have provided that relates to the opinions you will offer in this litigation that you have not already produced in this litigation;

19. All emails, written correspondence or notes of oral communications concerning the methodology of any studies authored by you or the methodology used in any study relied on or considered by you in forming the opinions you will offer in this litigation that you have not already produced in this litigation;

20. All emails, written correspondence or notes of oral communications with any journalist or reporter since February 1, 2013 concerning whether radiofrequency radiation is associated with brain tumors or other alleged health effects;

21. All correspondence with Lennart Hardell concerning radiofrequency energy and potential health effects or studies thereof since February 1, 2013;

22. All documents and correspondence relating to the US National Toxicology Program (NTP), including the NTP's studies relating to HF-EMF used in the US telecommunication industry; and

23. All documents and communications not previously produced and responsive to the List of Requested Documents attached to the deposition subpoena issued to you in this matter on March 3, 2013.

The requests above exclude: (1) drafts of any expert reports or disclosures regardless of the form in which the draft is recorded; and (2) communications between Plaintiff's