

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
Case No. 7:23-cv-897

IN RE:	)	
	)	
CAMP LEJEUNE WATER LITIGATION	)	PRETRIAL ORDER
	)	
This Document Relates To:	)	
<i>Fancher v. United States</i> , No. 7:23-cv-00275	)	
	)	

Date of Conference: September 9, 2026

I. STIPULATIONS.

The parties stipulate and agree to the following:

A. Jurisdiction

1. This Court has subject matter jurisdiction under Section 804(d) of the Camp Lejeune Justice Act. Camp Lejeune Justice Act of 2022, Pub. L. No. 117-168, § 804(d), 136 Stat. 1759, 1803.
2. This Court is the appropriate venue for this matter under Section 804(d) of the Camp Lejeune Justice Act. Camp Lejeune Justice Act of 2022, Pub. L. No. 117-168, § 804(d), 136 Stat. 1759, 1803.

B. Joinder

1. There are no issues of misjoinder or nonjoinder of parties.

C. Capacity of the Parties

1. Plaintiff David Fancher has the capacity to sue in his individual capacity.
2. Defendant United States is the federal government with capacity to sue and be sued.

D. Plaintiff-Specific Stipulated Facts

1. Plaintiff is “[a]n individual . . . who resided, worked, or was otherwise exposed . . . for not less than 30 days during the period beginning on August 1, 1953, and ending on December 31, 1987, to water at Camp Lejeune, North Carolina, that was supplied by, or on behalf of, the United States” who is entitled to “bring an action in the United States District Court for the Eastern District of North Carolina to

obtain appropriate relief for harm that was caused by exposure to the water at Camp Lejeune.” Camp Lejeune Justice Act of 2022, Pub. L. No. 117-168, § 804(b), 136 Stat. 1759, 1803.

2. Plaintiff complied with section 2675 of title 28, United States Code, before bringing his action under the Camp Lejeune Justice Act, Pub. L. No. 117-168, title VIII § 804 (2022).
3. In December 1997, Plaintiff was diagnosed with primary renal cell carcinoma, clear cell type at age 39
4. On December 12, 1997, Plaintiff underwent an open right radical nephrectomy.
5. Following his nephrectomy, Plaintiff’s surgical site became infected. As a result of his nephrectomy, Plaintiff developed a right abdominal flank scar measuring 39cm x 1cm.
6. The treatment and care Plaintiff received for his renal cell carcinoma was reasonable and medically necessary.

A. Other Fact Stipulations

Plaintiff

1. Plaintiff is either an individual, including a veteran (as defined in section 101 of title 38, United States Code), or the legal representative of such an individual, who resided, worked, or was otherwise exposed (including in utero exposure) for not less than 30 days during the period beginning on August 1, 1953, and ending on December 31, 1987, to water at Camp Lejeune, North Carolina, that was supplied by, or on behalf of, the United States of America; and
2. Plaintiff complied with section 2675 of title 28, United States Code, before bringing his or her action under the Camp Lejeune Justice Act, Pub. L. No. 117–168, title VIII, § 804 (2022).

Camp Lejeune Background

3. Marine Corps Base Camp Lejeune (“Camp Lejeune”) is a military base operated by the United States, located outside of Jacksonville, in Onslow County, North Carolina. The base is located on the coast of the Atlantic Ocean, with approximately 11 miles of usable shoreline, and currently occupying approximately 156,000 acres (244 square miles) in total. (Compl. ¶ 2; Answer, ¶ 2; Brigham Dec. 9, 2024 Rep. at 3).
4. The United States owned, operated, and managed Camp Lejeune between August 1, 1953, and December 31, 1987, by and through the Navy and Marine Corps. (See Answer ¶ 20).

5. Between 1953 and 1987, the Camp Lejeune Military Reservation occupied an area of approximately 110,000 acres (including 2,772 acres that encompasses Marine Corps Air Station New River). (Longley Dec. 7, 2024 Rep. at 6; Brigham Dec. 9, 2024 Rep. at 3).
6. Nine water distribution systems supplied water at Camp Lejeune between 1953 and 1987: Hadnot Point, Tarawa Terrace, Holcomb Boulevard, Camp Geiger, Camp Johnson (also known as Montford Point), Courthouse Bay, Marine Corps Air Station New River, Onslow Beach, and Stone Bay Rifle Range (also known as Rifle Range). (See Compl. ¶ 23; Answer ¶ 23; Brigham Dec. 9, 2024 Rep. at 2; CLJA_WATERMODELING_01-0000190491).
7. The Hadnot Point Industrial Area and the Hadnot Point Landfill were the sources of contamination of groundwater wells connected to the Hadnot Point water treatment plant. (Brigham Rep. at 7, 42.)
8. ABC One-Hour Cleaners, located at 2127 Lejeune Boulevard (Highway 24), was the source of the tetrachloroethylene (or PCE) contamination at the Tarawa Terrace water treatment plant. (Brigham Rep. at 2, 25.)
9. The Marine Corps used 400-gallon water trailers to supply water for field training at Camp Lejeune during the statutory period. These water trailers were also known as “water buffaloes” or “water bulls.” (Brigham Rep. at 2, 97; Master Ans. at 23 ¶¶ 99-100.)

Development and Use of ATSDR’s Camp Lejeune Water Models

10. The Agency for Toxic Substances and Disease Registry (ATSDR) is a federal, non-regulatory public health agency codified in the Comprehensive Environmental Response, Compensation & Liability Act (CERCLA) of 1980, also known as Superfund (CERCLA 1980). 42 U.S.C. § 9604(i). (Maslia Rebuttal Rep. at p. 8.)
11. In 1980, Congress created ATSDR to implement the health-related sections of laws that protect the public from hazardous wastes and environmental spills of hazardous substances. (Maslia Rep. at 12.)
12. CERCLA states that “ATSDR shall perform a health assessment for each facility on the National Priorities List” 42 U.S.C. § 9604(i)(6)(A).
13. The Environmental Protection Agency placed an off-base dry cleaner, ABC One Hour Cleaners, and Marine Corps Base Camp Lejeune on its National Priorities List in March 1989 and October 1989, respectively. (Maslia Rep. at 23.)
14. On March 28–29, 2005, ATSDR held an Expert Panel on “ATSDR’s Water-Modeling Activities in Support of the Current Study of Childhood Birth Defects and Cancer at U.S. Marine Corps Base Camp Lejeune, North Carolina.” (2005 ATSDR Expert Panel Transcripts and Summary Report.)

15. Between June 2007 and February 2009, ATSDR completed modeling and published reports related to Tarawa Terrace entitled “Analyses of Groundwater Flow, Contaminant Fate and Transport, and Distribution of Drinking Water at Tarawa Terrace and Vicinity, U.S. Marine Corps Base Camp Lejeune, North Carolina: Historical Reconstruction and Present-Day Conditions.” (ATSDR TT Model Chap. A–I Reports.)
16. On April 29–30, 2009, ATSDR held a second Expert Panel regarding “ATSDR’s Methods and Analyses for Historical Reconstruction of Groundwater Resources and Distribution of Drinking Water at Hadnot Point, Holcomb Boulevard, and Vicinity, U.S. Marine Corps Base Camp Lejeune, North Carolina.” (2009 ATSDR Expert Panel Transcripts and Summary Report.)
17. Between October 2010–March 2013, ATSDR completed water modeling and published reports related to Hadnot Point/Holcomb Boulevard entitled “Analyses and Historical Reconstruction of Groundwater Flow, Contaminant Fate and Transport, and Distribution of Drinking Water Within the Service Areas of the Hadnot Point and Holcomb Boulevard Water Treatment Plants and Vicinities, U.S. Marine Corps Base Camp Lejeune, North Carolina.” (ATSDR HP/HB Model Chap. A–D Reports.)

II. CONTENTIONS.

A. Plaintiff

1. Factual Contentions:

- (a) Plaintiff David Fancher enlisted in the United States Marine Corps inactive reserves in December 1976, began active duty in June 1977, and was honorably discharged on June 12, 1981.
- (b) Plaintiff was stationed at Marine Corps Base Camp Lejeune from approximately October 16, 1979 through June 16, 1981, except during periods of deployment. He lived in the Mainside Barracks from October through November 1979 and again from November 1980 through June 1981.
- (c) While living off base from approximately November 1979 through May 1980, Plaintiff continued to shower at the Mainside Barracks, stayed in the barracks approximately one or two nights per week, and ate dinner at the chow hall approximately three times per week.
- (d) Plaintiff contends that he resided, worked, or was otherwise exposed to water at Camp Lejeune for not less than thirty days between August 1, 1953, and December 31, 1987. Exposure modeling places Plaintiff among the higher-exposed kidney-cancer plaintiffs for both trichloroethylene and perchloroethylene.

- (e) In approximately December 1997, at age thirty-nine, Plaintiff was diagnosed with primary clear-cell renal cell carcinoma of the right kidney.
- (f) Plaintiff underwent a right radical nephrectomy on December 12, 1997. Plaintiff had a large mass measuring 9.5 x 7 x 7 cm at the time of removal. His surgical incision extended approximately eighteen inches around his midsection and required approximately 200 stitches.
- (g) Following surgery, Plaintiff developed a serious incisional and surgical-site infection. The incision opened and required antibiotics, local wound care, frequent cleaning, packing, and rebandaging over a period of months before healing from the inside out.
- (h) The nephrectomy and incision caused chronic marked atrophy of the right rectus abdominis muscle, producing a permanent asymmetric abdominal deformity or flank bulge. Plaintiff describes the bulge as approximately the size of a basketball and previously used a supportive Velcro band to hold it in place.
- (i) Plaintiff also has extensive permanent scarring, numbness below the surgical line, hypersensitivity and severe pain above the surgical line when the area is touched or rubbed, and nighttime muscle spasms that interrupt his sleep.
- (j) The abdominal deformity, scarring, sensory changes, pain, spasms, weakness, and impaired balance have affected Plaintiff's gait, mobility, back, sleep, physical fitness, work activities, hobbies, and marital relations. Plaintiff stopped or substantially reduced all physical activities.
- (k) At the time of diagnosis, Plaintiff was married to Camilla Fancher and was the principal financial provider for a household with four children under the age of sixteen. Plaintiff contends that the diagnosis, prognosis communicated to him, major surgery, infection, and uncertainty concerning his survival caused substantial mental suffering and affected his wife and children.
- (l) Plaintiff contends that the relationship between his exposure to water at Camp Lejeune and his clear-cell renal cell carcinoma is sufficient to conclude that a causal relationship exists or, alternatively, is sufficient to conclude that a causal relationship is at least as likely as not.
- (m) Plaintiff will rely on evidence concerning the contaminants present in water supplied at Camp Lejeune, the duration and modeled level of his exposure, the approximately sixteen-year-and-six-month latency period, his young age at diagnosis, the size and pathology of

the tumor, the absence of a family history of kidney cancer, and the opinions of his general and specific causation experts.

- (n) Plaintiff is a lifetime nonsmoker, had no known occupational exposure to volatile organic compounds or other relevant toxins, and had no family history of kidney cancer. Plaintiff disputes that weight, family history of other cancers, asbestos, insufficient exposure, latency, or another asserted factor more likely explains his renal cell carcinoma.
- (o) Plaintiff contends that he was not obese at the time of diagnosis. Plaintiff's obesity and diabetes developed after the kidney-cancer diagnosis.
- (p) Plaintiff seeks recovery of reasonable and necessary past medical expenses and out-of-pocket expenses supported by the evidence. The Plaintiff has incurred \$6,475.30 in private insurance charges and \$3,736.00 in private insurance paid expenses for his Track 1 illness and those injuries or conditions stemming from a Track 1 illness or its treatment. VHA also provided and/or paid for medical care related to Plaintiff's Track 1 illness and those injuries or conditions stemming from his Track 1 illness or its treatment, and Plaintiff seeks recovery of the reasonable value of such care. Defendant contends, based upon the VHA's managerial accounting methodology, that the value of such care includes \$1,561.00 in TriWest/CCN costs, \$2,981.00 in VHA indirect and direct costs, or \$1,839.00 in VHA direct costs. Plaintiff also seeks damages for the reasonable value of medical and related care services provided by his spouse as a result of his Track 1 illness and treatment, in an amount to be determined at trial based upon the testimony and evidence presented. Plaintiff does not offer a quantified claim for future medical expenses.
- (q) Plaintiff does not offer an additional quantified claim for lost earnings.
- (r) Plaintiff additionally claims all offsets, including any Veteran Disability Benefits, alleged by the United States as a corresponding damage which was incurred by the respective Plaintiff.
- (s) Plaintiff seeks compensation for past and future physical pain and suffering, mental suffering, inconvenience, permanent scarring and disfigurement, permanent sensory impairment, sleep disruption, physical limitations, and diminished quality and enjoyment of life resulting from his kidney cancer, nephrectomy, postoperative infection, abdominal deformity, and continuing symptoms.
- (t) Plaintiff acknowledges that any award must be offset to the extent required by CLJA § 804(e). Plaintiff contends that § 804(e) is limited to a disability award, payment, or benefit provided under a program administered by the Secretary of Veterans Affairs, Medicare, or Medicaid, and provided in connection with health care or a disability relating to exposure to the water at Camp Lejeune.

- (u) Plaintiff contends that the United States bears the burden of establishing the factual and legal basis for each claimed offset. Plaintiff disputes any claimed offset that is duplicative, incorrectly calculated, unsupported by evidence, or, not sufficiently certain and calculable, reasonably probable, and non-speculative, as well as any offset that does not satisfy the source and subject-matter requirements of CLJA § 804(e)(2). See D.E. 885 at 4, 9.

2. Factual Issues:

- (a) Whether Plaintiff resided, worked, or was otherwise exposed to water at Camp Lejeune for not less than thirty days during the statutory period.
- (b) The nature, duration, routes, frequency, and extent of Plaintiff's exposure, including the contaminants and concentrations to which he was exposed.
- (c) Whether the relationship between Plaintiff's exposure to water at Camp Lejeune and his clear-cell renal cell carcinoma satisfies the CLJA causation standard.
- (d) Whether weight, family history of other cancers, asbestos, latency, insufficient exposure, or another asserted factor provides a more likely explanation for Plaintiff's kidney cancer.
- (e) Whether Plaintiff's postoperative infection, abdominal-wall atrophy, flank bulge, scarring, numbness, hypersensitivity, pain, spasms, and functional limitations were caused by the nephrectomy and related treatment.
- (f) The nature, extent, duration, permanency, and future consequences of Plaintiff's harm.
- (g) The reasonable amount of Plaintiff's past and future economic and noneconomic damages.
- (h) The factual basis and amount of any offset required by CLJA § 804(e).

3. Legal Issues:

- (a) Is Plaintiff entitled to obtain appropriate relief under the Camp Lejeune Justice Act for harm that was caused by exposure to the water at Camp Lejeune?
- (b) What is the appropriate relief for harm that was caused by exposure to the water at Camp Lejeune?
- (c) Is Defendant entitled to an offset required by CLJA § 804(e), and if so, in what amount?

B. Defendant

1. Facts

Water Modeling

- (a) No Camp Lejeune water distribution systems other than Tarawa Terrace, Hadnot Point, and Holcomb Boulevard were contaminated.
- (b) The Tarawa Terrace water distribution system did not supply contaminated water prior to the 1970s at the earliest or after February 1985 when contaminated-supply-wells were shut down and removed from service.
- (c) The Hadnot Point water distribution system did not supply contaminated water prior to July 1972 when supply-well HP-651 was first used or after February 1985 when contaminated-supply wells were shut down and removed from service.
- (d) The chemical and physical properties of the COCs in Camp Lejeune water make it unavoidable that substantial portions of the COCs were lost to the air and removed during the water storage, treatment, and distribution process due to volatilization or evaporation.
- (e) ATSDR developed Camp Lejeune groundwater models for three water distribution systems only: Tarawa Terrace, Hadnot Point, and Holcomb Boulevard.
- (f) ATSDR did not develop Camp Lejeune groundwater models for the six other water distribution systems at Camp Lejeune.
- (g) ATSDR's Camp Lejeune groundwater models simulate monthly contaminant concentrations that are inaccurate, biased-high (i.e., higher concentrations over longer timeframes), highly uncertain, and unreliable.
- (h) ATSDR had limited to no data to construct their Camp Lejeune groundwater models, including limited well operation or pumping data for very short periods and no data for decades; no observed concentration data prior to 1982; limited observed concentration data, mainly in 1982 and 1985; no information on the timing and rate of contaminant releases to the subsurface; and no contaminant transport parameters specific to Camp Lejeune.
- (i) Even if mobile field water tanks (water buffaloes or water bulls) were filled with water from a contaminated water system, which was unlikely for training exercises west of New River, the contaminant concentrations in Camp Lejeune water were likely substantially lower in those tanks due to unavoidable contaminant losses from evaporation or volatilization during filling, use, and variations of temperature. These losses would have been in the order of 41% to 61%.

History

- (j) The Hadnot Industrial Area and the Hadnot Point Landfill Area were the source of contamination of ground water wells connected to the Hadnot Point water treatment plant.
- (k) ABC One-Hour Cleaners, located at 2127 Lejeune Boulevard (Highway 24), was the source of the tetrachloroethylene (or PCE) contamination at the Tarawa Terrace water treatment plant.
- (l) The Marine Corps used 400-gallon water trailers to supply water for field training at Camp Lejeune during the statutory period. These water trailers were also known as “water buffaloes” or “water bulls.”
- (m) At Marine Corps Base Camp Lejeune, only three water treatment plants—Hadnot Point, Tarawa Terrace, and Holcomb Boulevard—supplied water that may have been contaminated at certain times between 1953-1987.
- (n) Holcomb Boulevard’s water treatment plant supplied water that may have been contaminated only intermittently when receiving Hadnot Point water between 1971-1985.
- (o) Six other areas of the base—Camp Geiger, Camp Johnson/Montford Point, Courthouse Bay, Marine Corps Air Station New River, Onslow Beach, and Rifle Range—were serviced by water treatment plants that did not contain contaminated water.
- (p) All nine Water Treatment Plants had standpipes capable of filling 400-gallon water buffalo trailers. Thus, transported water could originate from non-contaminated areas.
- (q) ABC One-Hour Cleaners—the source of the Tarawa Terrace contamination—opened in June 1954 or later.
- (r) Given the considerable travel distance to Mainside and the relative isolation of Camp Geiger, Camp Johnson/Montford Point, Courthouse Bay, and Rifle Range, Marines assigned to these sections of the base that were served by uncontaminated water systems were unlikely to frequently travel to Mainside areas on Hadnot Point. Each of these remote locations maintained independent infrastructure and essential services, reducing the need for regular travel to Hadnot Point.

General Causation

- (s) Of the chemicals detected in the Camp Lejeune water, the scientific evidence only supports a causal connection between trichloroethylene (“TCE”) and kidney cancer but only at occupational exposure levels that were higher than the environmental levels present at Camp Lejeune.
- (t) The ATSDR Camp Lejeune epidemiology studies do not support a causal relationship between exposure to the chemicals in the Camp Lejeune water and kidney cancer.

- (u) Plaintiff cannot establish general causation between exposure to water at Camp Lejeune and kidney cancer.
- (v) The opinions of Plaintiff's experts that there is sufficient evidence of a causal relationship between kidney cancer and the chemicals in water at Camp Lejeune at the levels present at Camp Lejeune are methodologically flawed and unsupported by science.

Specific Causation

- (w) Plaintiff cannot establish specific causation for trichloroethylene ("TCE") and kidney cancer because Plaintiff's alleged exposures are far below the levels at which scientific evidence supports a causal association with kidney cancer.
- (x) Plaintiff cannot establish specific causation for tetrachloroethylene ("PCE"), benzene, or vinyl chloride and kidney cancer because Plaintiff's alleged exposures to these agents are far below exposure levels evaluated in toxicological studies that did not report significant increases in kidney tumors.
- (y) Plaintiffs' kidney cancer was not caused by his exposure to Camp Lejeune water.
- (z) Plaintiffs' kidney cancer was idiopathic in origin.
- (aa) To the extent Plaintiff alleges non-Track 1 illnesses (e.g., colon polyps and kidney stones), there is no evidence that his exposure to Camp Lejeune water was capable of causing or did, in fact, cause those illnesses.
- (bb) Plaintiff was stationed at Hadnot Point from October 1979 to May 1980 and from November 1980 to June 1981 for approximately 337 days.
- (cc) Plaintiff resided on an off-base apartment with his wife from January 1980 to May 1980.
- (dd) To date, Plaintiff's renal cell carcinoma has had no evidence of recurrence of his kidney cancer.
- (ee) Plaintiff is expected to live a normal life expectancy.

Damages

- (ff) Plaintiff has received and will receive disability and/or healthcare awards, payments or benefits relating to exposure to the water at Camp Lejeune.
- (gg) Plaintiff has obtained health care from the VHA in connection with his kidney cancer.

- (hh) Plaintiff has obtained health care in connection with his kidney cancer that has been covered by CCN of the VHA.
- (ii) Plaintiff has received disability compensation from the VBA in connection with his kidney cancer.
- (jj) It is reasonably certain that Plaintiff will continue to receive disability compensation from the VBA in connection with his kidney cancer.
- (kk) It is reasonably certain that Plaintiff will continue to receive disability compensation from the VBA in connection with his kidney cancer at an amount reasonably similar or the same as he currently receives, adjusted for cost of living.

2. Factual Issues

Water Modeling

- (a) Did the Tarawa Terrace water distribution system supply contaminated water prior to the 1970s at the earliest or after February 1985 when contaminated-supply-wells were shut down and removed from service?
- (b) Did the Hadnot Point water distribution system supply contaminated water prior to July 1972 when supply-well HP-651 first began operating or after February 1985 when contaminated supply-wells were shut down and removed from service?
- (c) Were the Tarawa Terrace, Hadnot Point, and Holcomb Boulevard water distribution systems the exclusive sources of contaminated water supplied by the United States at Camp Lejeune?
- (d) Was the Plaintiff exposed to contaminants in water supplied by the United States at Camp Lejeune, and, if so, what was the extent of that exposure?

History

- (e) Did ABC One-Hour Cleaners, the source of the Tarawa Terrace contamination, open in June 1954 at the earliest?

Damages

- (f) What is the amount of economic damage that Plaintiff suffered related to water contamination at Camp Lejeune, if any?
- (g) What is the amount of non-economic damage that Plaintiff suffered related to water contamination at Camp Lejeune, if any?

- (h) If Plaintiff is permitted to seek the amounts charged by a medical provider as a measure of past medical damages, what is the reasonable value of those medical services provided to Plaintiff?
- (i) What amount of disability awards, payments, or benefits was provided to Plaintiff under the laws administered by the Secretary of Veterans Affairs in connection with health care or a disability relating to exposure to the water at Camp Lejeune?
- (j) What calculable amount of disability awards, payments, or benefits is sufficiently certain to be provided to Plaintiff under the laws administered by the Secretary of Veterans Affairs in connection with health care or a disability relating to exposure to the water at Camp Lejeune?

3. Legal Issues

Water Modeling

- (a) Do ATSDR's Camp Lejeune groundwater models meet the requirements of Federal Rule of Evidence 702 and *Daubert* such that they can reliably be used or relied upon to make accurate individual plaintiff exposure determinations for any period between August 1, 1953 and December 31, 1987?

Specific Causation

- (b) Dr. Kelly Reynolds does not provide reliable estimates of Plaintiff's exposure to trichloroethylene ("TCE"), tetrachloroethylene ("PCE"), benzene, and vinyl chloride from which to determine whether Plaintiff experienced exposures sufficient to cause kidney cancer.
- (c) To the extent Plaintiff alleges non-Track 1 illnesses (*e.g.*, colon polyps and kidney stones), those alleged injuries do not constitute "other injuries or conditions stemming from a Track 1 Illness or its treatment" within the meaning of this Court's Case Management Order No. 12. Therefore, Plaintiff "waiv[ed] [his] rights" to allege that such an injury was "caused by the water at Camp Lejeune."
- (d) Plaintiff's claim under the Camp Lejeune Justice Act for his kidney stones, which allegedly arose on March 10, 2025, is barred under Section 804(j)(1) of the CLJA because it accrued after the passage of the CLJA, *i.e.*, August 10, 2022.

Damages

- (e) What category of damages is Plaintiff permitted to seek under the Camp Lejeune Justice Act in order to seek "appropriate relief from harm?"

- (f) Does “appropriate relief from harm” under the Camp Lejeune Justice Act include Plaintiff’s claim for past and future economic damages? If so, what categories of economic damages?
- (g) Is Plaintiff permitted to seek the amounts charged by or amounts paid to a medical provider as a measure of past medical damages? Or is Plaintiff limited to the reasonable past value of medical expenses?
- (h) Is Plaintiff barred from requesting an award amount above the amount Plaintiff requested in the administrative claim?

The United States reserves the right to supplement or otherwise amend such other contentions that arise from the evidence at trial.

III. CLAIMS AND DEFENSES NOT ABANDONED

A. Plaintiff

- 1. Count 1 in Master Complaint, D.E. 25, at 42-22: Relief Under the Camp Lejeune Justice Act.
- 2. Section VII in the Short Form Complaint, as Amended: Claim for Relief.

B. Defendants’ Affirmative Defenses to Plaintiffs’ Count 1

- 1. Any award is limited to compensatory damages.
- 2. Any award is limited to the amount stated in the administrative claim, and any relief requested over and above that amount is barred.
- 3. Any award is subject to appropriate offsets under the Camp Lejeune Justice Act.
- 4. The United States’ liability, if any, is subject to appropriate offsets for services or care which the United States has already paid.
- 5. The United States’ liability under the CLJA, if any, is limited to claims accruing before August 10, 2022.

IV. EXHIBITS.

A. Plaintiff

Ex. #	TITLE	OBJECTION
<u>Water Modeling Exhibits (Phase I)</u>		
1	Chapter A_Summary and Findings (Hadnot Point & Holcomb Blvd)	
2	Chapter A_Supplement 1 (Hadnot Point & Holcomb Blvd)	
3	Chapter A_Supplement 2 (Hadnot Point & Holcomb Blvd)	
4	Chapter A_Supplement 3 (Hadnot Point & Holcomb Blvd)	
5	Chapter A_Supplement 4 (Hadnot Point & Holcomb Blvd)	
6	Chapter A_Supplement 5 (Hadnot Point & Holcomb Blvd)	
7	Chapter A_Supplement 6 (Hadnot Point & Holcomb Blvd)	
8	Chapter A_Supplement 7 (Hadnot Point & Holcomb Blvd)	
9	Chapter A_Supplement 8 (Hadnot Point & Holcomb Blvd)	
10	Chapter B_Geohydrologic Framework (Hadnot Point & Holcomb Blvd)	
11	Chapter C_Contaminant Occurrence at Restoration Program Sites (Hadnot Point & Holcomb Blvd)	
12	Chapter D_Contaminant Occurrence at Storage Tank Sites (Hadnot Point & Holcomb Blvd)	
13	Chapter A_Summary and Findings (Tarawa Terrace)	
14	Chapter B_Geohydrologic Framework (Tarawa Terrace)	
15	Chapter C_Groundwater Flow Simulation (rev0108) (Tarawa Terrace)	
16	Chapter D_Compound Properties and Degradation Pathways (Tarawa Terrace)	

17	Chapter E_Contaminant Occurrence in Groundwater (rev0108) (Tarawa Terrace)	
18	Chapter F_PCE Fate and Transport (Tarawa Terrace)	
19	Chapter G_PCE Mass Transport (Tarawa Terrace)	
20	Chapter H_Pumping Schedule Effects (Tarawa Terrace)	
21	Chapter I_Parameter Sensitivity, Uncertainty, and Variability (Tarawa Terrace)	
22	Executive Summary (Tarawa Terrace)	
23	Appendix A2. Simulated PCE and PCE Degradation By-Products in Finished Water, Tarawa Terrace Water Treatment Plant, January 1951–March 1987	
24	Appendix A7. Reconstructed (simulated) monthly mean concentrations in finished water for tetrachloroethylene (PCE), trichloroethylene (TCE), trans-1,2-dichloroethylene (1,2-tDCE), and vinyl chloride (VC) at the Hadnot Point water treatment plant, Hadnot Point–Holcomb Boulevard Study Area, U.S. Marine Corps Base Camp Lejeune, North Carolina, January 1942–June 2008	
25	Appendix A8. Reconstructed (simulated) monthly mean concentrations of tetrachloroethylene (PCE), trichloroethylene (TCE), trans-1,2-dichloroethylene (1,2-tDCE), vinyl chloride (VC), and benzene in finished water distributed to Holcomb Boulevard family housing areas, Hadnot Point–Holcomb Boulevard study area, U.S. Marine Corps Base Camp Lejeune, North Carolina, 1972–1985	
26	Expert Report - Morris Maslia PE (2024-10-25)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
27	Appendix A — Curriculum Vitae for Morris L. Maslia, P.E.	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]

28	Rebuttal Report - Morris Maslia PE (2025-01-14)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
29	Assessing Model Fit with Sampling Data at TT Water Supply Wells and the WTP - Maslia 2025-04-24	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
30	Rebuttal Report - Dr Leonard Konikow (2025-01-14)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
31	Rebuttal Report - Dr David Sabatini (2025-01-14)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
32	Ex B - Dr. Sabatini Vitae - 2025-01-14 Rebuttal Report	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
33	Expert Report - Dr Norman Jones and Jeffrey Davis (2024-10-25)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
34	Rebuttal Report - Dr Norman Jones and Jeffrey Davis (2025-01-14)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert

		opinion subject to United States Motion to Exclude [D.E. 367]
35	Rainfall Imputation Addendum - Dr Norman Jones and Jeffrey Davis (2025-02-25)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; Expert opinion subject to United States Motion to Exclude [D.E. 367]
36	2005-03-28 Panel Meeting Transcript	
37	2005-03-29 Panel Meeting Transcript	
38	2005 Final Report (Peer Review)	
39	2009-04-29 Panel Meeting Transcript	
40	2009-04-30 Panel Meeting Transcript	
41	2009 Final Report (Peer Review)	
42	ATSDR's Response to the Department of the Navy's Letter on Assessment of ATSDR Water Modeling for Tarawa Terrace	
43	Agency for Toxic Substances and Disease Registry (ATSDR) Response to the 2009 National Research Council (NRC) Report	
44	Melts Deposition	
45	Extension of Tarawa Terrace water models from 1994 through 2007	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
46	Interim Remedial Action Report - ABC Cleaners	
47	CAMP LEJEUNE WATER MODELING —ATSDR obtains additional site data for ABC One-Hour Cleaners Site	
48	Data request for 1995-2207 for ABC One Hour Cleaners site	
49	JOINT ATSDR/EPA REGION IV TECHICAL MEETINGS ON TARAUA TERRACE	
50	Email correspondence to Dr. Prabhakar Clement regarding TT-26 sensitivity analysis and posting	Hearsay, FRE 802

	Chapters F and H - Morris L. Maslia, P.E. Depo Exhibit D-13	
51	Screenshot of a PowerPoint slide titled 'CDC 24/7 Camp Lejeune Summary 2014' - Morris L. Maslia, P.E. Depo Exhibit P-1	
52	ATSDR Support Estimation of VOC Removal report from AH Environmental Consultants Inc., - Morris L. Maslia, P.E. Depo Exhibit 14	
53	letter dated February 21, 2007 from Morris Maslia to Dr. Leonard F. Konikow - Morris L. Maslia, P.E. Depo Exhibit 20	
54	Author's reply by T. Prabhakar Clement from Ground Water, January-February 2012 - Morris L. Maslia, P.E. Depo Exhibit 23	
55	Leonard Konikow CV and publications from the prior 10 years, January 13, 2025 - Leonard Konikow, Ph.D. Depo Exhibit 4	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
56	Curriculum vitae of Norman L. Jones, Ph.D - Norman L. Jones, Ph.D. Depo Exhibit 5	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
57	Jones and Davis Biodegradation Rate Sensitivity Analysis - Norman L. Jones, Ph.D. Depo Exhibit 10	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
58	Resume for R. Jeffrey Davis - R. Jeffrey Davis Depo Exhibit 4	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]

59	David Sabatini's handwritten water- treatment plant interview notes. - David A. Sabatini, Ph.D., P.E., BCEE Depo Exhibit 4	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
60	Operator's, unit, direct-support, and general-support maintenance manual for specified military trailers - David A. Sabatini, Ph.D., P.E., BCEE Depo Exhibit 7	
61	August 19, 1982 memo on chlorinated-hydrocarbon interference in Tarawa Terrace and Hadnot Point samples - David A. Sabatini, Ph.D., P.E., BCEE Depo Exhibit P-1	
62	PCE concentration, in micrograms per liter, Figure F16 - Alexandros Spiliotopoulos, Ph.D. Depo Exhibit 14	
63	January 2010 U.S. Department of Justice Executive Office for U.S. Attorneys publication, 'Expert Witnesses' - Remy J.-C. Hennet, Ph.D. Depo Exhibit 9	
64	Jennings Laboratory report, 10/31/80 - Remy J.-C. Hennet, Ph.D. Depo Exhibit 14	
65	JTC Environmental Consultants Report # 7, prepared 12/19/84 - Remy J.-C. Hennet, Ph.D. Depo Exhibit 16	
66	JTC Environmental Consultants Report # 17, prepared 2/6/85 - Remy J.-C. Hennet, Ph.D. Depo Exhibit 17	
67	Chronology of well sampling data - Remy J.-C. Hennet, Ph.D. Depo Exhibit 18	
68	USMC memo, 4/1989, subject: Water Monitoring Related to the Installation Restoration Program - Remy J.-C. Hennet, Ph.D. Depo Exhibit 19	
69	2/27/85 meeting notes - Remy J.-C. Hennet, Ph.D. Depo Exhibit 20	
70	Operational history for well HP-622 - Remy J.-C. Hennet, Ph.D. Depo Exhibit 22	
71	Operational history for well HP-651 - Remy J.-C. Hennet, Ph.D. Depo Exhibit 23	
72	Email chain, 7/15/11, from A Short to K. Pritchard, subject: Re: HP & HB Well Pumps; Jan-Jun 1980 - Remy J.-C. Hennet, Ph.D. Depo Exhibit 25	
73	Well pumping data 1978 - 1983 - Remy J.-C. Hennet, Ph.D. Depo Exhibit 26	

74	Exhibit 3-1, Conceptual Illustration for PCE Transport Between ABC Cleaners and Well TT-26 - Remy J.-C. Hennet, Ph.D. Depo Exhibit 27	
75	USA v DICO, INC., et al., Order on Bench Trial - Remy J.-C. Hennet, Ph.D. Depo Exhibit 28	
76	Dr. Hennet's 12/22/20 expert report In Re: Baby Washington case CLDEP0000002071 - 0000002127 - Remy J.-C. Hennet, Ph.D. Depo Exhibit 29	
77	HENNET_USA_00000000034 - 76 - Remy J.-C. Hennet, Ph.D. Depo Exhibit 11	
78	E-mail (topmost) dated May 1, 2025, Joshua Carpenito to Kevin Dean, Dawn Bell, Jim Roberts - Remy J.-C. Hennet, Ph.D. Depo Exhibit 30	Hearsay, FRE 802
79	S.S. Papadopoulos & Associates Invoices (top) 9/21/2022 - Remy J.-C. Hennet, Ph.D. Depo Exhibit 35	
80	S.S. Papadopoulos & Associates Invoices (top) 9/21/2022 - Remy J.-C. Hennet, Ph.D. Depo Exhibit 36	
81	S.S. Papadopoulos & Associates Invoices (top) 12/31/2019 - Remy J.-C. Hennet, Ph.D. Depo Exhibit 37	
82	Sunday - Jan. 27, 1985, 1300 - Remy J.-C. Hennet, Ph.D. Depo Exhibit 42	
83	Hadnot Point 8/5/2008 Questions for Mr. Mundt - Remy J.-C. Hennet, Ph.D. Depo Exhibit 45	
84	Hadnot Point & Holcomb Blvd 8/5/2008 - Remy J.-C. Hennet, Ph.D. Depo Exhibit 46	
85	Readings 1/28/85 - 2/5/85 - Remy J.-C. Hennet, Ph.D. Depo Exhibit 47	
86	ATSDR letter dated July 11, 2003, from Morris Maslia to Thomas Burton regarding Camp Lejeune site-visit data requests - Scott Williams Depo Exhibit 3	
87	Camp Lejeune Underground Storage Tank Program partnering-meeting materials dated July 16, 2003 - Scott Williams Depo Exhibit 4	
88	Camp Lejeune UST Management Web Portal User's Manual, dated July 3, 2007 - Scott Williams Depo Exhibit 5	
89	May 2005 email chain among Morris Maslia, Robert Faye, and Camp Lejeune staff regarding site-data information - Scott Williams Depo Exhibit 6	

90	August 5, 2005 email from Scott Williams regarding the FY04 environmental-liabilities data-call response - Scott Williams Depo Exhibit 7	
91	December 8, 2005 ATSDR letter on Camp Lejeune water-system data and cooperation - Scott Williams Depo Exhibit 8	
92	September 27, 2007 NC DENR letter on UST incident 18849 at Building TT-60/Courthouse Road - Scott Williams Depo Exhibit 9	
93	March 2010 email chain among Scott Williams, Robert Faye, and Morris Maslia regarding ATSDR groundwater reports - Scott Williams Depo Exhibit 10	
94	July 2009 email chain between Morris Maslia and Robert Faye regarding Tarawa Terrace reports not provided to ATSDR - Scott Williams Depo Exhibit 11	
95	March 22, 2010 ATSDR letter on discovery of Camp Lejeune water-modeling data - Scott Williams Depo Exhibit 12	
96	April 2010 emails on IR-88, Lot 203, the base boundary, and SWMU-350 briefings - Scott Williams Depo Exhibit 13	
97	December 1, 2009 email from Scott Williams regarding archived disposal information for IR sites 73, 82, and 88 - Scott Williams Depo Exhibit 14	
98	Scott Williams' handwritten notes from an ATSDR meeting dated March 26, 2008 - Scott Williams Depo Exhibit 15	
99	January 9, 2008 email chain between Scott Williams and Lianne Sheppard regarding lab-results spreadsheet corrections - Scott Williams Depo Exhibit 16	
100	Scott Williams' handwritten notes regarding committee reports, review timing, and recommendations - Scott Williams Depo Exhibit 17	
101	October 8, 2008 National Academies letter proposing review of Camp Lejeune study protocols - Scott Williams Depo Exhibit 18	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
102	June 17, 2009 National Academies letter on report delivery and FACA compliance - Scott Williams Depo Exhibit 19	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901

103	October 27, 2009 CDC/ATSDR letter opposing a proposed NRC review contract - Scott Williams Depo Exhibit 20	
104	October 2009 Williams-Sinks emails on the NRC peer-review dispute and letter to Mach and Payne - Scott Williams Depo Exhibit 21	
105	October 29, 2009 email chain forwarding a response to the ATSDR letter to the Department of the Navy and Marine Corps - Scott Williams Depo Exhibit 22	
106	Scott Williams' handwritten memorandum-book notes - Scott Williams Depo Exhibit 23	
107	November 10, 2009 House Science Committee letter on the DOD/NAS review contract - Scott Williams Depo Exhibit 24	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
108	Draft Department of the Navy letter to the St. Petersburg Times responding to a November 8, 2009 Camp Lejeune article - Scott Williams Depo Exhibit 25	
109	March 31, 2011 DoD/VA Deployment Health Working Group agenda with NRC report overview - Scott Williams Depo Exhibit 26	
110	Scott Williams' handwritten steno-notebook notes - Scott Williams Depo Exhibit 27	
111	Scott Williams' handwritten notes regarding the ATSDR health survey and contaminant categories - Scott Williams Depo Exhibit 28	
112	Contract modification effective April 28, 2011, reducing funds on a National Academy of Sciences/NRC order - Scott Williams Depo Exhibit 30	
113	October 17, 2007 Division on Earth and Life Studies BEST-K-06-08-A CLJ199438 - CLJ19939 - Susan N.J. Martel Depo Exhibit 4	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
114	Project Information, Title: Contaminated Drinking Water at Camp Lejeune, Starting Date 04/10/07 CLJ199549 - Susan N.J. Martel Depo Exhibit 5	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
115	The National Academies Office of Contracts and Grants Memorandum of April 11, 2007, CLJ003251 - CLJ003400 - Susan N.J. Martel Depo Exhibit 6	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
116	August 9, 2007 NRC letter with quarterly Camp Lejeune drinking-water progress report - Susan N.J. Martel Depo Exhibit 7	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901

117	Chair Peter Raven Letters of July 16, 2007 to Prospective Members of Committee CLJ19944 - CLJ199467 - Susan N.J. Martel Depo Exhibit 8	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
118	Acceptance Forms from Prospective Members of Committee CLJ201159 - CLJ201174 - Susan N.J. Martel Depo Exhibit 9	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
119	Background Information and Confidential Conflict of Interest Disclosure for Prospective Members CLJ201175 - CLJ201186 - Susan N.J. Martel Depo Exhibit 9A	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
120	The National Academies Study Process, Ensuring Independent, Objective Advice - Susan N.J. Martel Depo Exhibit 10	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
121	Policy on Committee Composition and Balance and Conflicts of Interest for Committees, May 12, 2003 CLJ201357 - CLJ201366 - Susan N.J. Martel Depo Exhibit 11	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
122	E-mail of 5/15/2008, Maslia to Martel, re NRC committee on contamination of drinking water at Camp Lejeune - Susan N.J. Martel Depo Exhibit 12	Hearsay, FRE 802
123	E-mail of 3/23/2009, Martel to Olshan et al, re Camp Lejeune - WED, March 25 Conference Call - Susan N.J. Martel Depo Exhibit 13	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901; Designated as confidential by the National Academies of Sciences
124	E-mail of 3/24/2009, Savitz to Martel et al, re Camp Lejeune - WED, March 25 Conference Call - Susan N.J. Martel Depo Exhibit 14	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901; Designated as confidential by the National Academies of Sciences
125	Draft "dissenting" paragraph 4/27/09, - Susan N.J. Martel Depo Exhibit 15	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901; Designated as confidential by the National Academies of Sciences
126	Fax of 5/5/2009, Sheppard to Martel, Mail Ballot - Susan N.J. Martel Depo Exhibit 16	Hearsay, FRE 802; lack of foundation,

		authenticity, FRE 901; Designated as confidential by the National Academies of Sciences
127	Top E-mail of 7/22/2009, Clapp to Ruckart et al, re Peer review comments on NRC report - Susan N.J. Martel Depo Exhibit 17	Hearsay, FRE 802; Designated as confidential by the National Academies of Sciences
128	Manuscript approval record for "Contaminated Water Supplies at Camp Lejeune" - Susan N.J. Martel Depo Exhibit 18	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
129	Certificate of Compliance Section 15 of the FACA 6/16/2009 CLJ003469 - CLJ003470 - Susan N.J. Martel Depo Exhibit 19	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
130	E-mail of 7/14/2009, Ensminger to Martel, re Peer Review Comments for The Camp Lejeune Report - Susan N.J. Martel Depo Exhibit 20	Hearsay, FRE 802
131	Memorandum of 8/6/2009, Martel to Committee on Contaminated Drinking Water at Camp Lejeune CLJ003467 - CLJ003468 - Susan N.J. Martel Depo Exhibit 21	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
132	Testimony of John R. Nuckols, PhD Before the Committee on Veterans' Affairs U.S. Senate, October 8, 2009 - Susan N.J. Martel Depo Exhibit 22	Hearsay, FRE 802 & 805; lack of foundation, authenticity, FRE 901
133	Order for Supplies or Services 2009 May 01, CLJ199527 - CLJ199547 - Susan N.J. Martel Depo Exhibit 23	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
134	Amendment of Solicitation/ Modification of Contract 4/20/2011 CLJ201367 - CLJ201370 - Susan N.J. Martel Depo Exhibit 24	Hearsay, FRE 802 & 805; lack of foundation, authenticity, FRE 901
135	DoD/VA Deployment Health Working Group Meeting, Thursday, March 31, 2011 - 1:30 to 3:30 PM, Agenda CLJ184687 - Susan N.J. Martel Depo Exhibit 25	Hearsay, FRE 802 & 805; lack of foundation, authenticity, FRE 901
136	Handwritten Notes on Mandalay Beach Resort Pad - Susan N.J. Martel Depo Exhibit 26	Hearsay, FRE 802
137	Handwritten Notes, DHWG Meeting - Susan N.J. Martel Depo Exhibit 27	Hearsay, FRE 802
138	NAS Letter of May 10, 2011 to Secretary of the Navy - Susan N.J. Martel Depo Exhibit 28	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901

139	NAS Code of Conduct, Approved by the NAS Council December 26, 2018 - Susan N.J. Martel Depo Exhibit 29	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
140	March 20, 2008 Martel email on the updated ATSDR Camp Lejeune Health Study work plan - Susan N.J. Martel Depo Exhibit 30	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
141	E-mail of 9/2/2008, Martel to Dawson, Flow Charts CLJ002759 - CLJ002767 - Susan N.J. Martel Depo Exhibit 31	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
142	Top E-mail of 12/3/2007, Ensminger to Reisa, re NAS Camp Lejeune Committee Stay at Camp Lejeune, CLJ199522 - CLJ199523 - Susan N.J. Martel Depo Exhibit 32	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
143	September 6, 2006, Division on Earth and Life Studies, Summary Data, CLJ199430 - CLJ199436 - Susan N.J. Martel Depo Exhibit 33	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
144	HHS Letter of October 22, 2010 to Navy and Marine Corps - Susan N.J. Martel Depo Exhibit 34	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
145	Top E-mail of 1/9/2008, Williams to Sheppard, re Lab Results Spreadsheet - Susan N.J. Martel Depo Exhibit 35	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901; Designated as confidential by the National Academies of Sciences
146	Top E-mail of 2/5/2008, Williams to Sheppard, re Lab Results Spreadsheet - Susan N.J. Martel Depo Exhibit 36	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901; Designated as confidential by the National Academies of Sciences
147	CH2M Hill PowerPoint presentation, "Muster Roll Status Meeting," dated May 22, 2014 - Kim Henderson Depo Exhibit 2	
148	June 10, 2014 CH2M Hill letter on muster-roll storage and retrieval systems - Kim Henderson Depo Exhibit 3	
149	August 4, 2014 CH2M Hill letter on muster-roll storage and microfilm scanning - Kim Henderson Depo Exhibit 4	

150	Statement of Work, "Muster Roll Scanning – MOD 6," for Marine Corps Base Camp Lejeune under Navy CLEAN CTO-0003 - Kim Henderson Depo Exhibit 5	
151	Modification No. 3 to Navy CLEAN contract and task order CTO-0003 for Camp Lejeune communication strategy and support - Kim Henderson Depo Exhibit 6	
152	Draft MCB Camp Lejeune Muster Roll Database User's Guide, December 2016 - Kim Henderson Depo Exhibit 7	
153	Monthly Progress Report for Navy CLEAN CTO-0003, Camp Lejeune communication strategy and support, February 2017 - Kim Henderson Depo Exhibit 8	
154	May 15, 2018 email from Christopher Lutes regarding MCB Camp Lejeune ATSDR vapor-intrusion summaries - Kim Henderson Depo Exhibit 9	
155	April 27, 2018 Lutes email sending a product-information table for ATSDR use - Kim Henderson Depo Exhibit 10	
156	October 2008 Camp Lejeune IR Partnering Team summary with vapor-intrusion evaluation - Kim Henderson Depo Exhibit 11	Subject to orders excluding vapor intrusion evidence. D.E. 439; 729.
157	July 8, 2011 draft Camp Lejeune drinking-water Q&A with tracked edits - Kim Henderson Depo Exhibit 12	
158	August 2011 draft "Camp Lejeune Historic Drinking Water Questions and Answers," Second Edition - Kim Henderson Depo Exhibit 13	
159	Memorandum, "ATSDR Camp Lejeune Water Modeling," Bates CH00000038–CH00000044 - Kim Henderson Depo Exhibit 14	
160	September 26, 2011 email forwarding NRC report and Camp Lejeune benzene responses - Kim Henderson Depo Exhibit 15	
161	Draft project instructions for document-sensitivity reviews at Camp Lejeune, October 2015, with Kim Henderson's comments - Kim Henderson Depo Exhibit 16	
162	September 2016 CH2M memo on document-sensitivity reviews at Camp Lejeune and MCAS New River - Kim Henderson Depo Exhibit 17	

163	Jacobs Solutions Inc. Form 10-K for the fiscal year ended September 29, 2023 - Kim Henderson Depo Exhibit 18	
164	General Anthony C. Zinni biographical résumé and career summary - Anthony Charles Zinni Depo Exhibit 1	Irrelevant, FRE 402 & 403; Hearsay, FRE 802.
165	U.S. Marine Corps record of Anthony Zinni's assignments and dates - Anthony Charles Zinni Depo Exhibit 2	Irrelevant, FRE 402 & 403.
166	Camp Lejeune base map, Bates Navy_MDL01-000216 - Anthony Charles Zinni Depo Exhibit 3	
167	May 6, 1965 Camp Lejeune Globe issue with Marines filling canteens from a water buffalo - Anthony Charles Zinni Depo Exhibit 4	
168	Globe photograph of Marines filling canteens from a water buffalo on Onslow Beach Road - Anthony Charles Zinni Depo Exhibit 5	
169	August 29, 1974 Camp Lejeune Globe newspaper issue - Anthony Charles Zinni Depo Exhibit 6	
170	Four 1982 Camp Lejeune organizational charts for the base, division, brigade, and support group - Anthony Charles Zinni Depo Exhibit 7	
171	Photograph of Camp Lejeune potable-water filling point with red hose - Anthony Charles Zinni Depo Exhibit 8	
172	Exhibit 1 - Mark A. Cagiano - 03-11-2025	Hearsay, FRE 802; Relevance, FRE 402
173	Exhibit 3 - Mark A. Cagiano - 03-11-2025	Hearsay, FRE 802; Relevance, FRE 402
174	Exhibit 4 - Mark A. Cagiano - 03-11-2025	Hearsay, FRE 802; Relevance, FRE 402
175	Exhibit 5 - Mark A. Cagiano - 03-11-2025	Hearsay, FRE 802; Relevance, FRE 402
176	Exhibit 1 - Ernest David Hunt - 03-11-2025	Hearsay, FRE 802; Relevance, FRE 402
177	Exhibit 2 - Ernest David Hunt - 03-11-2025	Hearsay, FRE 802; Relevance, FRE 402
178	Exhibit 3 - Ernest David Hunt - 03-11-2025	Hearsay, FRE 802; Relevance, FRE 402
179	Exhibit 4 - Ernest David Hunt - 03-11-2025	Hearsay, FRE 802; Relevance, FRE 402

180	2024-11-05 Jones & Davis Reliance Materials - Revised	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
181	2025-01-21 Materials Considered - Jones Davis Rebuttal	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
182	2025-01-21 Materials Considered - Konikow Rebuttal	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
183	2025-01-21 Materials Considered - Maslia Rebuttal	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
184	2025-04-09 Amended-Supplemental Materials Considered List- Sabatini	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
185	Demonstrative Exhibits from ATSDR Hadnot Point and Holcomb Blvd Water Model Reports (Figures & Tables)	
186	Demonstrative Exhibits from ATSDR Tarawa Terrace Water Model Reports (Figures & Tables)	
187	Any item from Expert's Material Considered List	Impermissibly broad, FRCP 26(a)(3)(iii)
188	Any deposition exhibit	Impermissibly broad, FRCP 26(a)(3)(iii)

189	Demonstrative Figures and Tables from Expert Report - Morris Maslia PE (2024-10-25)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
190	Demonstrative Figures and Tables from Rebuttal Report - Morris Maslia PE (2025-01-14)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
191	Demonstrative Figures and Tables from Assessing Model Fit with Sampling Data at TT Water Supply Wells and the WTP - Maslia 2025-04-24	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
192	Demonstrative Figures and Tables from Rebuttal Report - Dr Leonard Konikow (2025-01-14)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
193	Demonstrative Figures and Tables from Rebuttal Report - Dr David Sabatini (2025-01-14)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
194	Demonstrative Figures and Tables from Expert Report - Dr Norman Jones and Jeffrey Davis (2024-10-25)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
195	Demonstrative Figures and Tables from Rebuttal Report - Dr Norman Jones and Jeffrey Davis (2025-01-14)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert

		opinion subject to United States Motion to Exclude [D.E. 367]
<u>General Causation Exhibits (Phase II)</u>		
196	Camp Lejeune Justice Act	
197	Dr. Benjamin Hatten GC Rep. 12/8/2024 (Kidney)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motions to Exclude [D.E. 574, 609; 886; 890]
198	All exhibits, reliance materials and references listed in Dr. Benjamin Hatten GC Rep. (Kidney)	Impermissibly broad, FRCP 26(a)(3)(iii)
199	All exhibits, reliance materials and references listed in Dr. Benjamin Hatten's Materials Considered Lists	Impermissibly broad, FRCP 26(a)(3)(iii)
200	Dr. Kathleen Gilbert GC Rep. 12/8/2024 (Kidney)	Hearsay, FRE 802, expert opinions unhelpful and unreliable, FRE 702 & 703
201	All exhibits, reliance materials and references listed in Dr. Kathleen Gilbert GC Rep. (Kidney)	Impermissibly broad, FRCP 26(a)(3)(iii)
202	All exhibits, reliance materials and references listed in Dr. Kathleen Gilbert's Materials Considered Lists	Impermissibly broad, FRCP 26(a)(3)(iii)
203	Dr. Michael Freeman GC Rep. 12/8/2024 (Kidney)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motions to Exclude [D.E. 609; 886; 890]
204	All exhibits, reliance materials and references listed in Dr. Michael Freeman GC Rep. (Kidney)	Impermissibly broad, FRCP 26(a)(3)(iii)
205	All exhibits, reliance materials and references listed in Dr. Michael Freeman's Materials Considered Lists	Impermissibly broad, FRCP 26(a)(3)(iii)
206	Dr. Steven Bird GC Rep. 12/8/2024 (Kidney)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert

		opinion subject to United States Motion to Exclude [D.E. 574, 609, 886, 890]
207	Dr. Steven Bird's GC Suppl. Rep. 2/5/2025 (Kidney)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 574, 609, 886, 890]
208	All exhibits, reliance materials and references listed in Dr. Steven Bird GC Rep. and Suppl. Rep. (Kidney)	Impermissibly broad, FRCP 26(a)(3)(iii)
209	All exhibits, reliance materials and references listed in the Materials Considered Lists for Dr. Steven Bird	Impermissibly broad, FRCP 26(a)(3)(iii)
210	Dr. Timothy Mallon GC Rep. 12/8/2024 (Kidney)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 574, 609, 886, 890]
211	All exhibits, reliance materials and references listed in Dr. Timothy Mallon GC Rep. (Kidney)	Impermissibly broad, FRCP 26(a)(3)(iii)
212	All exhibits, reliance materials and references listed in Dr. Timothy Mallon's Materials Considered Lists	Impermissibly broad, FRCP 26(a)(3)(iii)
213	Dr. David Madigan Rebuttal GC Report 3/16/2025	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703
214	All exhibits, reliance materials and references listed in Dr. David Madigan Rebuttal GC Report	Impermissibly broad, FRCP 26(a)(3)(iii)
215	All exhibits, reliance materials and references listed in Dr. David Madigan's Materials Considered Lists	Impermissibly broad, FRCP 26(a)(3)(iii)
216	Dr. David Savitz Rebuttal GC Report 3/17/2025	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703
217	All exhibits, reliance materials and references listed in Dr. David Savitz Rebuttal GC Report	Impermissibly broad, FRCP 26(a)(3)(iii)
218	All exhibits, reliance materials and references listed in Dr. David Savitz Materials Considered Lists	Impermissibly broad, FRCP 26(a)(3)(iii)

219	Dr. Kyle Longley Expert Report of Dec. 7, 2024	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703.
220	Dr. Kyle Longley's Response to Dr. Brigham and Dr. Kelman Reports of Feb. 7, 2025	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703.
221	Dr. Kyle Longley's Rebuttal Report 1/13/2025	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703.
222	All exhibits, reliance materials and references listed in Dr. Kyle Longley's Reports	Impermissibly broad, FRCP 26(a)(3)(iii)
223	All exhibits, reliance materials and references listed in Dr. Kyle Longley's Materials Considered Lists	Impermissibly broad, FRCP 26(a)(3)(iii)
224	All exhibits, reliance materials and references marked as exhibits at the depositions of PLG GC experts and rebuttal general causation experts	Impermissibly broad, FRCP 26(a)(3)(iii)
225	Expert Report of Dr. Julie Goodman for Kidney Cancer 2/7/2025	
226	Goodman, Julie E., Zu, Jr, Loftus, Christine T., Lynch, Heather N., Prueitt, Robyn L., Mohar, Isaac, Shubin, Sara P., Sax, Sonja N. 2018. "Short-term ozone exposure and asthma severity: Weight-of-evidence analysis."	Relevance, FRE 401; Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
227	United States, Department of Health & Human Services, Agency for Toxic Substances and Disease Registry ("ATSDR"), 2017 Assessment of the Evidence for the Drinking Water Contaminants at Camp Lejeune and Specific Cancers and Other Diseases, January 13, 2017	
228	United States, Department of Health & Human Services, ATSDR, Public Health Assessment for Camp Lejeune Drinking Water U.S. Marine Corps Base Camp Lejeune, North Carolina, January 20, 2017	
229	United States, Department of Health & Human Services, ATSDR, Toxicological Profile for Trichloroethylene, June 2019	
230	United States, Environmental Protection Agency ("EPA"), Toxicological Review of Trichloroethylene	

	(CAS No. 79-01-6) In Support of Summary Information on the Integrated Risk Assessment System (IRIS), August 2011	
231	United States, EPA, Integrated Risk Information System (IRIS) Chemical Assessment Summary Trichloroethylene; CASRN 79-01-6 (Last Revised 9/28/2011)	
232	United States, EPA, Risk Evaluation for Trichloroethylene CASRN 79-01-6, November 2020	
233	United States, EPA, Trichloroethylene Unreasonable Risk Determination, December 2022	
234	International Agency for Research on Cancer (“IARC”), Monograph on the Evaluation of Carcinogenic Risks to Humans, 2014, Trichloroethylene, Tetrachloroethylene and Some Other Chlorinated Agents, Vol. 106	
235	United States, Department of Health and Human Services, National Toxicology Program (“NTP”), Report on Carcinogens Monograph on Trichloroethylene RoC Monograph 05, January 2015	
236	United States, Department of Health and Human Services, NTP, Report on Carcinogens, Fifteenth Edition, Trichloroethylene, CAS No. 79-01-6, 2021	
237	Institute of Medicine (“IOM”), Gulf War and Health: Volume 2: Insecticides and Solvents (2003)	
238	IOM, Review of VA Clinical Guidance for the Health Conditions Identified by the Camp Lejeune Legislation, 2015	
239	United States, EPA, Toxicological Review of Tetrachloroethylene (Perchloroethylene) (CAS No. 127-18-4) In Support of Summary Information on the Integrated Risk Information System (IRIS), February 2012	
240	United States, EPA, Risk Evaluation for Perchloroethylene (Ethene, 1,1,2,2-Tetrachloro-) CASRN: 127-18-4, December 2020	
241	United States, EPA, Carcinogenic Effects of Benzene: An Update, April 1998	

242	IARC, Monographs on the Evaluation of the Carcinogenic Risk of Chemicals to Humans, 1982, Some Industrial Chemicals and Dyestuffs, Vol 29	
243	IARC, Monographs on the Evaluation of the Carcinogenic Risks to Humans, 1987, Overall Evaluations of Carcinogenicity: An Updating of IARC Monographs, Vols. 1-42	
244	IARC, Monograph on the Evaluation of Carcinogenic Risks to Humans, 2018, Benzene, Vol. 120	
245	IARC, Monographs on the Evaluation of Carcinogenic Risks to Humans, 2012, Chemical Agents and Related Occupations, Vol 100F A Review of Human Carcinogens	
246	United States, Department of Health and Human Services, NTP, Report on Carcinogens, Eleventh Edition, Carcinogen Profiles, 2004	
247	United States, Department of Health and Human Services, NTP, Report on Carcinogens, Twelfth Edition, 2011	
248	United States, Department of Health and Human Services, NTP, Report on Carcinogens, Fourteenth Edition, 2016	
249	United States, Department of Health and Human Services, NTP, Report on Carcinogens, Fifteenth Edition, Benzene, 2021	
250	United States, Department of Health & Human Services, ATSDR, Toxicological Profile for Benzene, Draft for Public comment, October 2024	
251	United States, Department of Health & Human Services, ATSDR Toxicological Profiles for Vinyl Chloride, January 2024	
252	United States, Department of Health and Human Services, NTP, Report on Carcinogens, Fifteenth Edition, Tetrachloroethylene, 2021	
253	United States, EPA, Toxicological Review of Vinyl Chloride (CAS No. 75-01-4) In Support of Summary Information on the Integrated Risk Information System (IRIS), May 2000	
254	Intentionally Blank	

255	IARC, Monographs on the Evaluation of Carcinogenic Risks to Humans, 2008, 1, 3-Butadiene, Ethylene Oxide and Vinyl Halides (Vinyl Fluoride, Vinyl Chloride and Vinyl Bromide), Vol. 97	
256	Intentionally Blank	
257	Intentionally Blank	
258	Intentionally Blank	
259	United States, Department of Health and Human Services, NTP, Report on Carcinogens, Fifteenth Edition, Vinyl Halides (Selected), 2021	
260	ATSDR 2018 Morbidity Study	
261	Bove 2014 Mort. Study – Civ.	
262	Bove 2014 Mort Study – Civ. (Additional Files)	Incomplete, FRE 106
263	Bove 2014 Mort. Study – Mil.	
264	Bove 2014 Mort. Study – Mil. (Additional Files)	Incomplete, FRE 106
265	Bove 2024 Cancer Incid. Study	
266	Bove 2024 Cancer Incid. Study (Suppl. File)	
267	Bove 2024 Cancer Incid. Study – Preprint	
268	Bove 2024 Mort. Study	
269	Bove 2024 Mort. Study (Suppl. File)	
270	United States Environmental Protection Agency, December 9, 2024, Press Release, "Biden-Harris Administration Announces Latest Actions Under Nation's Chemical Safety Law to Protect People from Cancer-Causing Chemicals Trichloroethylene and Perchloroethylene."	Relevance, FRE 402 & 403; lack of foundation, authenticity, FRE 901
271	United States Environmental Protection Agency, December 6, 2024, Pre-Publication Notice of Final Rule, "Perchloroethylene (PCE); Regulation under the Toxic Substances Control Act (TSCA). FRL #: 8329-01-OCSP; Docket ID #: EPA-HQ-OPPT-2020-0270."	Relevance, FRE 402 & 403
272	United States Environmental Protection Agency, December 6, 2024, Pre-Publication Notice of Final Rule, "Trichloroethylene (TCE); Regulation under the Toxic Substances Control Act (TSCA). FRL #: 8317-02-OCSP; Docket ID #: EPA-HQ-OPPT-2020-0642."	Relevance, FRE 402 & 403
273	United States Environmental Protection Agency, December 18, 2024, Final Rule, Federal Register Vol. 89, No. 243, 40 CFR Part 751, "Perchloroethylene	Relevance, FRE 402 & 403

	(PCE); Regulation Under the Toxic Substances Control Act (TSCA)."	
274	United States Environmental Protection Agency, December 17, 2024, Final Rule, Federal Register Vol. 89, No. 242, 40 CFR Part 751, "Trichloroethylene (TCE); Regulation Under the Toxic Substances Control Act (TSCA)."	Relevance, FRE 402 & 403
275	Morbidity Study of Former Marines, Employees and Dependents, ATSDR Website, November 12, 2014, https://www.atsdr.cdc.gov/camp-lejeune/health-studies/morbidity-study-of-former-marines-employees-and-dependents.html	Relevance, FRE 402 & 403; lack of foundation, authenticity, FRE 901
276	Mortality Study of Marines, Navy Personnel, and Civilian Workers - Cohort Study Update, ATSDR Website, November 12, 2024, https://www.atsdr.cdc.gov/camp-lejeune/health-studies/mortality-study-of-marines-navy-personnel-and-civilian-workers-cohort-study-update.html	Relevance, FRE 402 & 403; lack of foundation, authenticity, FRE 901
277	Mortality Study of Marine and Navy Personnel, ATSDR Website, November 12, 2024, https://www.atsdr.cdc.gov/camp-lejeune/health-studies/mortality-study-of-marine-and-naval-personnel.html	Relevance, FRE 402 & 403; lack of foundation, authenticity, FRE 901
278	Mortality Study of Civilian Employees, ATSDR Website, November 12, 2024, https://www.atsdr.cdc.gov/camp-lejeune/health-studies/mortality-study-of-civilian-employees.html	Relevance, FRE 402 & 403; lack of foundation, authenticity, FRE 901
<u>Specific Causation Exhibits (Phase IIIa)</u>		
279	Fancher's Military Records	
280	Fancher's Medical Records	
281	Envelope from Camp Lejeune, NC	Irrelevant, FRE 402 & 403; lack of foundation, authenticity, FRE 901
282	Photo from AT Tow Company Barracks	Irrelevant, FRE 402 & 403; lack of foundation, authenticity, FRE 901
283	Photo from Training Range and Live Fire Range, Camp Lejeune, NC	Irrelevant, FRE 402 & 403; lack of foundation, authenticity, FRE 901

284	Photo from Onslow Beach	Irrelevant, FRE 402 & 403; lack of foundation, authenticity, FRE 901
285	Exposure Records of David Fancher (00275_FANCHER_0000000296; 00227_FANCHER_0000000385; 00227_FANCHER_0000000307; 00227_FANCHER_0000000312; 00227_FANCHER_0000001787)	
286	Cumulative Exposure Expert Report by Kelly A. Reynolds, MSPH, PhD, with Appendices 2/7/2025	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703
287	Kidney Exposure Timelines of Kelly A. Reynolds (PLG-EXPERT_REYNOLDS_0000000005-PLG-EXPERT_REYNOLDS_0000000009)	Irrelevant, FRE 402 & 403; Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703
288	Reynolds Calculations Summary – Appendix for Fancher (PLG-EXPERT_REYNOLDS_0000000090 - PLG-EXPERT_REYNOLDS_0000000096)	Irrelevant, FRE 402 & 403; Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703
289	Reynolds Calculations Summary – Appendix for Fancher, dated March 28, 2025 (PLG-EXPERT_REYNOLDS_0000000029-PLG-EXPERT_REYNOLDS_0000000056)	Irrelevant, FRE 402 & 403; Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703
290	All exhibits, reliance materials and references listed in Dr. Kelly Reynolds SC Report relating to Plaintiff David Fancher	Hearsay, FRE 802; Impermissibly broad, FRCP 26(a)(3)(iii)
291	All exhibits, reliance materials and references listed in the Materials Considered Lists for expert Kelly Reynolds	Hearsay, FRE 802; Impermissibly broad, FRCP 26(a)(3)(iii)
292	Dr. Joseph Del Pizzo SC Rep. 2/3/2025 (Fancher)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 569]
293	Dr. Joseph Del Pizzo Supplemental SC Rep. 5/14/2025 (Fancher)	Hearsay, FRE 802; expert opinions

		unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 569]
294	Errata to Dr. Del Pizzo's Rep. 7/23/2025 (Fancher)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 569]
295	All exhibits, reliance materials and references listed in Dr. Joseph Del Pizzo SC Rep. and Supplemental SC Rep. (Fancher)	Impermissibly broad, FRCP 26(a)(3)(iii)
296	All exhibits, reliance materials and references listed in the Materials Considered Lists for Joseph Del Pizzo's Report on Plaintiff David W. Fancher	Impermissibly broad, FRCP 26(a)(3)(iii)
297	Dr. Matthew Weiss SC Rep. 2/5/2025 (Fancher)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 569]
298	All exhibits, reliance materials and references listed in Dr. Matthew Weiss SC Rep. (Downs)	Irrelevant, FRE 402 & 403; Impermissibly broad, FRCP 26(a)(3)(iii)
299	All exhibits, reliance materials and references listed in the Materials Considered Lists for Matthew Weiss' Report on Plaintiff David Fancher	Impermissibly broad, FRCP 26(a)(3)(iii)
300	Dr. Yair Lotan SC Rep. 2/5/2025 (Fancher)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 569]
301	Dr. Yair Lotan Rebuttal SC Rep. 5/14/2025 (Fancher)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to

		United States Motion to Exclude [D.E. 569]
302	Errata to Dr. Lotan's Rep. 7/7/2025 (Fancher)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 569]
303	All exhibits, reliance materials and references listed in Dr. Yair Lotan's SC Rep. and Rebuttal SC Rep. (Fancher)	Impermissibly broad, FRCP 26(a)(3)(iii)
304	All exhibits, reliance materials and references listed in the Materials Considered Lists for Yair Lotan's Report and Rebuttal Report on Plaintiff David Fancher	Impermissibly broad, FRCP 26(a)(3)(iii)
305	Discovery Pool Profile Form for David Fancher	
306	Summary of David Fancher's Medical Records	Reserving objections for records not previously produced, Local Civil Rule 16.1(c)(3)
307	All exhibits, reliance materials and references marked as exhibits at the depositions of PLG specific causation experts	Impermissibly broad, FRCP 26(a)(3)(iii)
<u>Damages and Offsets Exhibits (Phase IIb)</u>		
308	Fancher's Medical Billing Records	Impermissibly broad, FRCP 26(a)(3)(iii); Authenticity FRE 901; Hearsay FRE 802
309	Blue Cross Blue Shield Lien Records for Fancher	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)
310	Newspaper Article re: Fancher's Kidney Cancer Diagnosis	Impermissibly broad, FRCP 26(a)(3)(iii)
311	Abdomen/Flank Photos (00275_FANCHER_0000006487 to 6520; 2728-2729)	Lack of foundation, authenticity, FRE 901
312	VBA Disability File and Records of David Fancher	Impermissibly broad, FRCP 26(a)(3)(iii)
313	Chad L. Staller's Report on Fancher, Oct. 29, 2025	Hearsay, FRE 802; expert opinions

		unhelpful and unreliable, FRE 702 & 703
314	All exhibits, reliance materials and references listed in Mr. Staller's Rep. and Rebuttal Rep. (Fancher)	Impermissibly broad, FRCP 26(a)(3)(iii)
315	All exhibits, reliance materials and references listed in the Materials Considered List (MCLs) for Mr. Staller's Report on Fancher	Impermissibly broad, FRCP 26(a)(3)(iii)
316	Appendix for Frank Mousser of Expert Marjorie Hackett-Wallace	Irrelevant, FRE 402 & 403; Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 856]
317	Rebuttal Expert Opinion Report of Marjorie Hackett-Wallace, dated January 20, 2026	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 856]
318	Corrected Rebuttal Expert Opinion Report of Marjorie Hackett-Wallace, dated January 27, 2026	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 856]
319	Amended T1 Injury and Related Conditions All Diseases (PLG-EXPERT_HACKETT-WALLACE_0000000100-103; PLG-EXPERT_HACKETT-WALLACE_0000000015-18)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to U.S. Motion to Exclude [D.E. 856]; authenticity, FRE 901; violation of scheduling order to extent based on undisclosed expert opinions, FRCP 26(a)(2) & 37
320	First Amended Appendix of David Fancher (PLG-EXPERT_HACKETT-WALLACE_0000000030)	Hearsay, FRE 802; expert opinions unhelpful and unreliable,

		FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 856]
321	Reliance Files of David Fancher (PLG-EXPERT_HACKETT-WALLACE_0000000008)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 856]
322	All exhibits, reliance materials and references listed in Ms. Hackett-Wallace's reports (Fancher)	Impermissibly broad, FRCP 26(a)(3)(iii)
323	All exhibits, reliance materials and references listed in the Materials Considered List (MCLs) for Ms. Hackett-Wallace on Plaintiff Fancher	Impermissibly broad, FRCP 26(a)(3)(iii)
324	VHA/CCN and CMS Materials Relied Upon by Wang Ji, MD for Plaintiff David Fancher (CLJA_VHA_0000000006; CLJA_CMS_0000000134; CLJA_CCN_0000000005)	
325	BCBS Lien Records of David Fancher (00275_FANCHER_0000007621)	Lack of foundation, authenticity, FRE 901
326	VHA Data Compilation of Final Copy of 25 plaintiffs and service members with II Total Costs (CLJA_VHA_0000000001)	
327	Memorandum from Janine Genovese (Associate Chief Financial Accounting Officer for the VHA), dated March 18, 2025 (CLJA_VHA_0000000001-05)	
328	Cover Letter from DOJ regarding their Production of Underlying Data for VHA dated June 23, 2025	
329	VHA Data Compilation: CLJA_VHA_0000000006	
330	VHA Data Compilation: CLJA_VHA_0000000007	
331	Cover Letter from DOJ regarding their Production of Data Dictionaries for VHA and TRICARE dated July 18, 2025	
332	VHA's Managerial Cost Accounting (MCA) Data Definitions last updated July 15, 2025: CLJA_VHA_0000000008	
333	List of Camp Lejeune data: CLJA_CCN_0000000001.XLSX	

334	Memo from the VA dated 02/20/2025, regarding update on VA/VHA/CCN Data Related to Camp Lejeune Litigation with bates number: CLJA_CCN_0000000002-4	
335	Cover Letter from DOJ regarding production of Underlying data of IVC Offsets Spreadsheet dated July 7, 2025	
336	Data Compilation of Underlying Offset Info: CLJA_CCN_0000000005.XLSX	
337	Memo from the VA dated June 11, 2025, regarding Underlying Offset Information: CLJA_CCN_0000000006-8	
338	Expert Report of Anirban Basu, Ph.D., dated January 20, 2026	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703
339	Appendix A5 of Anirban Basu for David Fancher, dated January 20, 2026	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703
340	All exhibits, reliance materials and references listed in Dr. Basu's report (Tukes)	Irrelevant, FRE 402 & 403; Impermissibly broad, FRCP 26(a)(3)(iii)
341	All exhibits, reliance materials and references listed in the Materials Considered Lists (MCLs) for Dr. Basu on Tukes	Irrelevant, FRE 402 & 403; Impermissibly broad, FRCP 26(a)(3)(iii)
342	Expert Report of Peter Rybolt [Rebuttal Witness, Offsets], dated January 20, 2026	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 858]
343	All exhibits, reliance materials and references listed in Mr. Peter Rybolt's report (Fancher)	Impermissibly broad, FRCP 26(a)(3)(iii)
344	All exhibits, reliance materials and references listed in the Materials Considered List (MCLs) for Mr. Rybolt on Plaintiff Fancher	Impermissibly broad, FRCP 26(a)(3)(iii)
345	Damages Assessment Form of David Fancher	

346	Summary of David Fancher's Medical Expenses	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)
347	All exhibits, reliance materials and references marked as exhibits at the depositions of PLG damages experts	Impermissibly broad, FRCP 26(a)(3)(iii); as to Marjorie Hackett-Wallace and Peter Rybolt, expert opinions unhelpful and unreliable, FRE 702 & 703 and expert opinions subject to U.S. Motions to Exclude [D.E. 856, 858]; hearsay, FRE 802
<u>Miscellaneous Exhibits</u>		
348	The most recent CV of any expert	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)
349	Any exhibits listed by Defendant	
350	Enlargements of any exhibit identified by any party	
351	Rebuttal exhibits	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)
352	Impeachment and/or cross-examination exhibits	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)
353	Deposition transcripts, discovery responses and/or pleadings used for impeachment	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)
354	Demonstrative and illustrative exhibits	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)

355	Any exhibits created in the courtroom to illustrate witness testimony	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)
356	Any chart, figure or table from any PLG expert report	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)
357	Supplementations to any PLG expert report	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)

B. Defendant

Ex. #	TITLE	BATES RANGE	OBJECTION
<u>Phase I Trial Exhibits</u>			
1.	The Globe dated December 4, 1975	00897_PLG_0000040390 - 401	
2.	The Globe dated March 10, 1960	00897_PLG_0000049366 - 81	
3.	Victor Melts Deposition Transcript dated April 12, 2001	CLJA_WATERMODELING_01-09_0000039015 - 9090	
4.	1962 Camp Lejeune Base Guide	Base_Guides_0000000077 - 97	
5.	1966 Camp Lejeune Base Guide	Base_Guides_0000000098 - 179	
6.	1977 Camp Lejeune Base Guide	Base_Guides_0000000627 - 94	
7.	1978 Camp Lejeune Base Guide	Base_Guides_0000000695 - 758	
8.	1979 Camp Lejeune Base Guide	Base_Guides_0000000759 - 828	
9.	1980 Camp Lejeune Base Guide	Base_Guides_0000000829 - 70	

10.	1984 Camp Lejeune Base Guide	Base_Guides_0000000871 - 922	
11.	1988 Camp Lejeune Base Guide	Base_Guides_0000000923 - 81	
12.	1953 Jacksonville, North Carolina Telephone Directory	BRIGHAM_USA_0000000010 - 13	
13.	1955 Jacksonville, North Carolina Telephone Directory	BRIGHAM_USA_0000000192-95	
14.	1959 Jacksonville, North Carolina Telephone Directory	BRIGHAM_USA_00000000185 - 87	
15.	1960 Jacksonville, North Carolina Telephone Directory	BRIGHAM_USA_00000000189 - 91	
16.	Semper Fidelis, A Brief History of Onslow County, North Carolina and Marine Corps Base, Camp Lejeune	BRIGHAM_USA_0000008862 - 985	
17.	The Devilpup, Volume Five by Camp Lejeune High School, Marine Corps Base, Camp Lejeune, N.C. dated 1954	BRIGHAM_USA_0000041226 - 337	
18.	State of North Carolina Leasing Records of ABC One-Hour Cleaners dated September 16, 1964	CLJA_EPA01-0000221397 - 421	

19.	Utility Study for Courthouse Bay, Camp Lejeune North Carolina by J.E. Sirrine Company (January 31, 1979)	CLJA_USMC_CAGE_0000200592 - 1257	
20.	Special Training Analysis, Camp Lejeune, North Carolina (April 1986)	CLJA_USMCGEN_0000027381 - 586	
21.	June 1959 Telephone Directory	CLJA_USMCGEN_0000074318 - 493	
22.	Marine Corps Base Camp Lejeune, North Carolina Telephone Directory (November 1970)	CLJA_USMCGEN_0000077468 - 78257	
23.	Marine Corps Base Camp Lejeune, North Carolina Telephone Directory (January 1980)	CLJA_USMCGEN_0000089039-528	
24.	Comprehensive Ground Water Monitoring Evaluation of ABC 1 Hour Cleaners by North Carolina Department of Human Resources, Division of Health Services (April 20, 1989)	CLJA_USMCGEN_0000312358 - 71	

25.	Site Inspection Report of ABC One Hour Cleaners by Cheryl A. McMorris of the NC Solid and Hazardous Waste Management Branch of the Environmental Health Section's CERCLA Unit (May 27, 1987)	CLJA_USMCGEN_0000312406 - 510	
26.	1986 Camp Lejeune Base Master Plan	CLJA_USMCGEN_0000326502-327617	
27.	1970 Camp Lejeune Base Master Plan	CLJA_USMCGEN_0000336978 - 337167	
28.	Assessment of Hydrologic and Hydrogeologic Data at Camp Lejeune Marine Corps Base (Report 89-4096) (1989)	CLJA_WATERMODELING_01-0000131765 - 832	
29.	Historic Water Distribution 1941-2000 Composite Produced	CLJA_WATERMODELING_01_0000190491-503	
30.	Proposed Assessment and Notice of Continuing Penalties by North Carolina Environmental Management Commission, File No. GW 86-01	CLJA_WATERMODELING_07-0001289853 - 61	
31.	Field Water Supply & Water Purification Equipment	CLJA_WATERMODELING_07-0001368605 - 9539	

32.	Map of Camp Lejeune and Raleigh, NC, Composite Map of Camp Lejeune Water Treatment Plants	Dkt. No. 335.1 (Ex. 1)	
33.	Jacksonville, NC <i>Daily News</i> (June 29, 1954)	CLJA_OCPL_0000000001 - 12	
34.	Camp Lejeune, NC Completion Report Vol. I (April 15, 1941 – September 30, 1942)	CLJA_USMCGEN_0000287341 - 7705	
35.	Camp Lejeune, NC Completion Report Vol. II (April 15, 1941 – September 30, 1942)	CLJA_USMCGEN_0000161226 - 1951	
36.	Camp Lejeune, NC Completion Report Vol. III (October 1, 1942 – December 18, 1943)	CLJA_USMCGEN_0000209879 - 10275	
37.	The Globe dated January 22, 1959	BRIGHAM_USA_0000013638 - 49	

38.	Department of the Army Technical Manual, TM 0-2330-213-14, Operator, Organization and Field Maintenance Instructions, Including Repair Parts and Special Tools List for Chassis Trailer: 11/2 Ton, 2-Wheel M103A1, M103A2, M103A3, M103A2, M103A3C, M103A4, and M103AC; Trailer, Cargo: 11/2 Ton, 2-Wheel M104, M104A1, M105A1, M105A2, and M104A2C; Trailer, Tank, Water: 11/2 Ton, 2- Wheel M106, M106A1, M107A2, and M107A2C; and Trailer, Van, Shop: Folding Sides, 11/2 Ton, 2-Wheel, M448, Headquarters, Department of the Army, January 1964, iv. Exhibit 15.		
39.	Department of the Army Technical Manual, TM 9-875B, 11/2 Ton, 2-Wheel Cargo Trailer M104 and 11/2 Ton, 2-Wheel Water Tank Trailer M106, 9, Exhibit X.		

40.	1956 Jacksonville, North Carolina Telephone Directory	BRIGHAM_USA_0000000001 - 3	
41.	Department of the Army Technical Manual, TM 9-2330-213-14&P, Operator, Organizational, Direct Support and General Support Maintenance Manual (Including Repair Parts and Special Tools List) for Trailer, Tank, Potable Water, 400 Gallons, 11/2 Ton, 2-Wheel, M149 (2330-00-542-2039), M149A1 (2330-00-832-8801), and M625 (2330-00-782-6059), Headquarters, Department of the Army, February 1981, front cover. Exhibit 16		
42.	Expert Report of Jay L. Brigham, Ph.D. dated December 9, 2024		
43.	Curriculum Vitae of Jay L. Brigham, Ph.D.		
44.	Errata to December 9, 2024 Expert Report of Jay L. Brigham, Ph.D.		
45.	Expert Report of Jay L. Brigham, Ph.D. dated February 7, 2025		

46.	Reliance Materials of Jay L. Brigham, Ph.D. for December 9, 2024 Expert Report, Attachment A		
47.	Reliance Materials of Jay L. Brigham, Ph.D. for December 9, 2024		
	Expert Report, Attachment B		
48.	Reliance Materials of Jay L. Brigham, Ph.D. for December 9, 2024 Expert Report, Attachment C		
49.	Reliance Materials of Jay L. Brigham, Ph.D. for February 7, 2025 Expert Report		
50.	Expert Report of Ari Kelman, Ph.D. dated February 7, 2025		
51.	Curriculum Vitae of Ari Kelman, Ph.D		
52.	Reliance Materials of Ari Kelman, Ph.D. for February 7, 2025 Expert Report		
53.	Expert Report of Alex Spiliotopoulos, Ph.D.	N/A	
54.	Expert Report of Remy Hennes, Ph.D.	N/A	
55.	Curriculum Vitae of Alex Spiliotopoulos, Ph.D.	N/A	
56.	Curriculum Vitae of Remy Hennes, Ph.D.	N/A	

57.	Reliance List of Alex Spiliotopoulos, Ph.D.		
58.	Reliance List of Remy Hennet, Ph.D.		
59.	Supplemental and Corrected Reliance Lists of Alex Spiliotopoulos, Ph.D.		
60.	Supplemental and Corrected Reliance Lists of Remy Hennet, Ph.D.		
61.	2005 ATSDR Expert Panel Summary	CLJA_WATERMODELING_01-0000018341 - 430	
62.	2009 ATSDR Expert Panel Summary	CLJA_WATERMODELING_05-0000783839 - 996	
63.	3.28.2005 ATSDR Expert Panel Transcript	CLJA_WATERMODELING_01-09-0000001845 – 2046	
64.	3.29.2005 ATSDR Expert Panel Transcript	CLJA_WATERMODELING_01-0000064462 - 663	
65.	4.29.2009 ATSDR Expert Panel Transcript	CLJA_WATERMODELING_01-0000011258 - 600	
66.	4.30.2009 ATSDR Expert Panel Transcript	CLJA_WATERMODELING_01-0000011601 - 877	

67.	May 2007 Government Accountability Office Report regarding Camp Lejeune	CLJA_HEALTHEFFECTS-0000073571 - 651	
68.	ATSDR Tarawa Terrace Water	CLJA_WATERMODELING_01-0000775401 - 420	
	Model, Executive Summary		
69.	ATSDR Tarawa Terrace Water Model, Chapter A Report	CLJA_WATERMODELING_09-0000615638 - 5753	
70.	ATSDR Tarawa Terrace Water Model, Chapter B Report	CLJA_WATERMODELING_01- 0000763440 - 467	
71.	ATSDR Tarawa Terrace Water Model, Chapter C Report	CLJA_WATERMODELING_01-0000092939 - 93046	
72.	ATSDR Tarawa Terrace Water Model, Chapter D Report	CLJA_HEALTHEFFECTS-0000131201 - 1263	
73.	ATSDR Tarawa Terrace Water Model, Chapter E Report	CLJA_WATERMODELING_01-0000754791 - 4838	
74.	ATSDR Tarawa Terrace Water Model, Chapter F Report	CLJA_WATERMODELING_01-0000093047 - 93114	
75.	ATSDR Tarawa Terrace Water Model, Chapter G Report	CLJA_HEALTHEFFECTS-0000129119 - 190	
76.	ATSDR Tarawa Terrace Water Model, Chapter H Report	CLJA_WATERMODELING_01-0000768339 - 398	

77.	ATSDR Tarawa Terrace Water Model, Chapter I Report	CLJA_WATERMODELING_01-0000768339 - 398	
78.	ATSDR Tarawa Terrace Water Model, Chapter K Report	CLJA_WATERMODELING_01-09_0000056174 - 261	
79.	Feb. 2007 Letter from M. Maslia and R. Faye to L. Konikow	CL_PLG-EXPERT_KONIKOW_0000000006 - 21	
80.	Jan. 12, 2007 ATSDR Water Modeling Team Email Exchange	CLJA_ATSDR_BOVE-0000158108 - 109	
81.	Jan. 13, 2007 Email from R. Faye to M. Maslia	CLJA_WATERMODELING_01-0000075306 - 307	Objection — Fed R. Evid. 802, 901(a), 403.
82.	Jun. 19, 2008 Navy Letter to ATSDR	CLJA_WATERMODELING_01-00000486488 - 495	
83.	2009 ATSDR Response to Navy Letter	CLJA_WATERMODELING_01-09-0000033263 - 326	
84.	2009 NRC Report on Camp Lejeune	CLJA_HEALTHEFFECTS-0000000431 - 769	
85.	"Complexities in Hindcasting Models – When Should We Say Enough Is Enough?" by T. Prabhakar Clement (2010)	CLJA_ATSDR_BOVE-0000048193 - 202	Objection — Fed R. Evid. 802, 106.
86.	Sept. 26, 2011 Email from B. Anderson to M. Maslia and M. Aral	CLJA_WATERMODELING_05-0000021184 - 86	

87.	Jan. 16, 2013 Letter from C. Portier to A. Hickey	CLJA_WATERMODELING_01-0000076158 - 59	
88.	Aug. 3, 2015 VA Press Release re Camp Lejeune Presumptions	CLJA_WATERMODELING_01-0000005179 - 5180	
89.	Transcript from Congressional Hearing on Camp Lejeune, Jun. 12, 2007	CH0000015957 - 16362	
90.	ATSDR Hadnot Point/Holcomb Boulevard Water Model, Chapter A Report	CLJA_WATERMODELING_01-0000942579 - 2788	
91.	ATSDR Hadnot Point/Holcomb Boulevard Water Model, Chapter A, Supplement 1 Report	CLJA_WATERMODELING_05-0000782151 - 2268	
92.	ATSDR Hadnot Point/Holcomb Boulevard Water Model, Chapter A, Supplement 2 Report	CLJA_WATERMODELING_05-0000824356 - 491	

93.	ATSDR Hadnot Point/Holcomb Boulevard Water Model, Chapter A, Supplement 2 Report ATSDR Hadnot Point/Holcomb Boulevard Water Model, Chapter A, Supplement 3 Report	CLJA_WATERMODELING_05-0000824492 - 603	
94.	ATSDR Hadnot Point/Holcomb Boulevard Water Model, Chapter A, Supplement 4 Report	CLJA_WATERMODELING_05-0000777405 - 470	
95.	ATSDR Hadnot Point/Holcomb Boulevard Water Model, Chapter A, Supplement 5 Report	CLJA_WATERMODELING_05-0000055698 - 757	
96.	ATSDR Hadnot Point/Holcomb Boulevard Water Model, Chapter A, Supplement 6 Report	CLJA_WATERMODELING_05-0000783320 - 394	
97.	ATSDR Hadnot Point/Holcomb Boulevard Water Model, Chapter A, Supplement 7 Report	CLJA_WATERMODELING_05-0000237237 - 292	

98.	ATSDR Hadnot Point/Holcomb Boulevard Water Model, Chapter A, Supplement 8 Report	CLJA_WATERMODELING_05-0000215052 - 5263	
99.	ATSDR Hadnot Point/Holcomb Boulevard Water Model, Chapter B Report	CLJA_WATERMODELING_01- 0000763440 - 467	
100.	ATSDR Hadnot Point/Holcomb Boulevard Water Model, Chapter C Report	CLJA_WATERMODELING_01-0000044287 - 588	
101.	ATSDR Hadnot Point/Holcomb Boulevard Water Model, Chapter D Report	CLJA_WATERMODELING_01-0000034873 - 35183	
102.	ATSDR Camp Lejeune Public Health Assessment, Aug. 4, 1997	CLJA_UST02-0000843893 - 3994	
103.	ATSDR Camp Lejeune Public Health Assessment, Jan. 20, 2017	CLJA_HEALTHEFFECTS-0000000011 - 212	
104.	Camp Lejeune Site Visit Photographs 2024	CLJA_PHOTOS_0000000001 – 58	

105.	July 1980 Memo Re: Trihalomethanes	CLJA_CLW0000000421 – 23	
106.	September 1980 Letter Re: North Carolina Drinking Water Regulations	CLJA_CLW0000000425	
107.	October 1980 Hadnot Point Trihalomethanes Report	CLJA_CLW0000000436	
108.	December 1980 Hadnot Point Trihalomethanes Report	CLJA_CLW0000000438	
109.	January 1981 Hadnot Point Trihalomethanes Report	CLJA_CLW0000000441	
110.	February 1981 Hadnot Point Trihalomethanes Report	CLJA_CLW0000000443	
111.	April 1981 Hadnot Point Trihalomethanes Report	CLJA_CLW0000000444	
112.	June 1981 Hadnot Point Trihalomethanes Report	CLJA_CLW0000000446	
113.	Camp Lejeune Water Treatment System Design Features	CLJA_WATERMODELING_07-0000003159 – 93; CLJA_WATERMODELING_07- 0001890446 – 795; CLJA_CLW0000001819 – 24	
114.	Well Operation Records	CLJA_05-0000110026 – 265; CLJA_05- 0000119744 – 79	

115.	Monitoring Well 78GW25 Records	CLJA_WATERMODELING_01-0000120257; CLJA_WATERMODELING_01-0000120260	
116.	Map of Camp Lejeune Water Systems	CLJA_WATERMODELING_01-0000190491	
117.	February 1985 JTC Environmental Report	CLJA_CLW0000005607-23	
118.	AH Environmental Report, Dec. 2004	CLJA_WATERMODELING_01-0000071446 – 512	
119.	Contaminated Well Records	CLJA_CLW0000005020 – 21	
120.	March 1985 Action Brief Re: Tarawa Terrace	CLJA_CLW0000001129 – 31	
121.	March 1985 Approval Action Brief Re: Tarawa Terrace	CLJA_CLW0000001132-33	
122.	March 1985 Memo Re: TCE Testing at Tarawa Terrace New Well	CLJA_CLW0000001182	
123.	March 1985 North Carolina Occupational Health Analysis Before & After TT-23	CLJA_CLW0000001183	

124.	April 1985 Direction to Operators at Tarawa Terrace	CLJA_CLW0000001193	
125.	Water Survey Chronology of Events	CLJA_WATERMODELING_01-0000125907 – 14	
126.	March 1985 Action Brief Re: Alternatives for Providing Water to Tarawa Terrace	CLJA_CLW0000001130 – 31	
127.	Daily Well Cycling Data	CLJA_WATERMODELING_01-0000204926 – 29	Objection — Fed R. Evid. 802, 901(a).
128.	Limited Hadnot Point Daily Well Cycling During Interconnection Event	CLJA_CLW0000001121 – 22	Objection — Fed R. Evid. 802, 901(a).
129.	February 1985 Chronology	CLJA_CLW0000004554 – 55	
130.	May 1986 Survey of Potable Water Plants	CLJA_CLW0000004944 – 55	
131.	April 1986 Letter to EPA	CLJA_CLW0000004935 – 37	
132.	March 1985 JTC Report	CLJA_CLW0000005521 – 40	
133.	Table Contaminated Mainside Wells	CLJA _CLW0000001653 – 54	Objection — Fed R. Evid. 802, 901(a).

134.	April 1985 Memo Re: Date Contaminated Wells Secured	CLJA_CLW0000001456	
135.	April 1982 Memo Re: Trihalomethane Sampling	CLJA_CLW0000000541	
136.	May 1982 Notes of Call from Grainger Lab	CLJA_CLW0000000542	Objection — Fed R. Evid. 802, 901(a).
137.	June 1982 Memo Re: Trihalomethane Resampling	CLJA_CLW0000000564 – 65	
138.	September 1992 Memo Re: HP- 637	CLJA_WATERMODELING_07-0001383050 – 51	
139.	April 1986 Report of Visit to Camp Lejeune Water Systems	CLJA_CLW0000001457 – 75	
140.	Jennings Laboratory report, 10/31/80	CLJA_USMCGEN_0000006650 - 0000006655	
141.	Handwritten notes of site visit of 2/11/25	HENNET_USA_0000000034 and 0000000076	
142.	JTC Environmental Consultants Report # 7, prepared 12/19/84	CLJA_NAVLANT-0000563489 - 0000563498	

143.	JTC Environmental Consultants Report # 17, prepared 2/6/85	CLJA_WATERMODELING_09-0000423217 - 423254	
144.	Chronology of well sampling data	CLJA_WATERMODELING_09-0000424933 - 494944	
145.	USMC memo, 4/1989, subject: Water 207 Monitoring Related to the Installation Restoration Program	CLJA_WATERMODELING_09-0000425332 - 425337	
146.	2/27/85 Meeting Notes	CLJA_WATERMODELING_09-0000427825 - 427827	
147.	Operational Monthly Report between 11/28/84 and 1/6/85	CLJA_WATERMODELING_07-0000019001 - 19004	Objection — Fed R. Evid. 802, 901(a).
148.	Email chain, 7/15/11, from A. Short to K. Pritchard, subject: Re: HP & HB Well Pumps; Jan-Jun 1980	CLJA_USMC_CAGE_0000350325 - 350345	
149.	Well pumping data 1978 - 1983	CLJA_USMC_CAGE_0000067935 - 68188	
150.	E-mail dated 6/8/2007 re Bldg 902/Site 88 Drilling	CLJA_UST02-0000523534	

151.	Photographs Time-Stamped 02/11/2025	HENNET_USA_0000000001 - 0096	
152.	Site-Visit Photographs	CLJA_PHOTOS-SSPA_0000000001 - 0045	
153.	Notes, Jan. 27, 1985	1300 CLJA_USMCGEN_0000006684	
154.	LeGrand, Harry E., 10/23/1958 page 2	CLJA_CLW0000000004	
155.	USGS (Harned, Douglas A., et al.), 1989, page 19	CLJA_WATERMODELING_01-0000084716	Objection — Fed R. Evid. 106.
156.	I.e., LeGrand, Harry E., 10/23/1958, pages 2-3	CLJA_CLW0000000004 - 0005	
157.	LeGrand, Harry E., 4/2/1959, page 2-3	CLJA_CLW0000000035 - 0036	
158.	LeGrand, Harry E., May 1959, pages 3-4	CLJA_CLW0000000050 - 005	
159.	LeGrand, Harry E., May 1959, pages 9-10	CLJA_CLW0000000056 - 57	
160.	Historical Camp Lejeune Water Distribution System Capacity Reports	CLJA_USMCGEN_0000125994-126092	
161.	USGS (Harned, Douglas A., et al.), 1989, plate 5	[CLJA_WATERMODELING_01-0000084767	

162.	USGS (Harned, Douglas A., et al.), 1989, plate 4	CLJA_WATERMODELING_01-0000084766	
163.	HB-WTP was upgraded to a 5 MGD capacity in 1987; cf	CLJA_WATERMODELING_07-0000003175	
164.	Marine Corps Base Master Plan, 01/01/1985, page IV-137	CLJA_WATERMODELING_01-0000317326	Objection — Fed R. Evid. 106.
165.	The Permutit Company, October 1971, pages 1-7	CLJA_WATERMODELING_07-0001125658 - 1125671	
166.	USGS (Harned, Douglas A., et al.), 1989, plate 1	CLJA_WATERMODELING_01-0000084763	
167.	Remedial, Investigation Report, Environmental Science and Engineering, April 1992, pages 2-1 to 2-3	CLJA_WATERMODELING_01-0000480561 - 480705	
168.	Baker Environmental, 08/24/1999	CLJA_WATERMODELING_01-0000114385 - 114534	
169.	NCDENR, August 2003	CLJA_WATERMODELING_01-0000136711 - 136793	

170.	U.S. EPA, 09/06/1994, page 9	CLJA_WATERMODELING_01-0000133944	Objection — Fed R. Evid. 106.
171.	Environmental Science and Engineering, April 1992, pages x-xiii	CLJA_WATERMODELING_01-0000480570 - 480573	Objection — Fed R. Evid. 106.
172.	Environmental Science and Engineering, May 1988, pages 2-5 to 2-7 and A- 7 to A-9	CLJA_WATERMODELING_07-0000352586 - 352588 and CLJA_WATERMODELING_07- 0000352635 - 352637	Objection — Fed R. Evid. 106.
173.	U.S. EPA, 09/06/1994, page 9	CLJA_WATERMODELING_01-0000133944	Objection — Fed R. Evid. 106.
174.	Water Survey Chronology of Events	CLJA_WATERMODELING_01-0000125907	Objection — Fed R. Evid. 106.
175.	VOCS in Camp Lejeune Water Supply	CLJA_CLW0000006610 – 6623	Objection — Fed R. Evid. 802, 901(a).
176.	Report of Investigation, 01/29/1985	CLJA_WATERMODELING_01-0000054259	
177.	Handwritten notes on Building 670, undated	CLJA_WATERMODELING_09-0000141027 - 141028	Objection — Fed R. Evid. 802, 901(a), 106.
178.	Unlabeled Chronology of Events, 02/08/1985	CLJA_CLW0000004522	

179.	ATSDR relied on a tentative statement by Victor John Melts given more than 40 years after fact: Deposition of Victor John Melts, 4/12/2001	ATSDR_WATERMODELING_01-0000893182	
180.	Betz, Elizabeth A., 3/17/94	CLJA_CLW0000005308 at CLJA_CLW0000005310	
181.	Bell, M.P., 2/21/1985	CLJA_WATERMODELING_01-0000179810 - 11	
182.	ATSDR, 11/14/2008	CLJA_WATERMODELING_01-0000798724	Objection — Fed R. Evid. 802, 106.
183.	NAVFAC Commander, 07/18/1980	CLJA_CLW0000000421-023	
184.	Betz, Elizabeth A., 07/29/1982	CLJA_CLW0000000587-88	
185.	Jennings Laboratories, 10/31/1982	CLJA_CLW0000000430-35	
186.	Betz, Elizabeth A., 02/12/1982	CLJA_CLW0000000468-69	
187.	Nancy Sonnenfeld Call Record, 01/20/1994	CLJA_WATERMODELING_01-0000129923	Objection — Fed R. Evid. 802.

188.	Grainger Laboratories, 08/10/1982	CLJA_CLW0000000592-95	
189.	NAVFAC (Bailey, J.R.), 04/25/1986	CLJA_CLW0000004928 - 4934	
190.	Frazelle, B. M., 04/08/1986	CLJA_CLW0000001456	
191.	Dated Hadnot Point Well Activation Chart	CLJA_WATERMODELING_07-0000019001 - 19004	Objection — Fed R. Evid. 802, 901(a), 106.
192.	The Permutit Company, October 1971, page 1	CLJA_WATERMODELING_07-0001125658	
193.	MCAS-WTP a re-carbonation basin figure.	CLJA_WATERMODELING_07-0000003137	
194.	U.S. EPA (Russell, Hugh H., et al.), January 1992.	CLJA_WATERMODELING_05-0000202955 - 202956	Objection — Fed R. Evid. 106.
195.	The Permutit Company, October 1971, Bulletin 2384D	CLJA_WATERMODELING_07-0001125662 and 1125674	
196.	Peirson & Whitman, 05/12/1952	CLJA_WATERMODELING_07-0001252390 - 1252392	Objection — Fed R. Evid. 106.
197.	AH Environmental Consultants, October 2000	CLJA-WATERMODELING_07-0000419874	

198.	Feb. 18, 1986 J.R. Bailey Memo	CLJA_CLW0000004938	
199.	The Permutit Company, October 1971	CLJA_WATERMODELING_07-0001125658 - 1125670	
200.	Transmissal of survey of potable water treatment plants and swimming pool water treatment	CLJA_CLW0000004944 – 55	
201.	U.S EPA ROD, 01/26/1993	CLJA_WATERMODELING_01-0000134624 - 134652	
202.	North Carolina Department of Natural Resources and Community Development (Shiver, Rick), December 1985	CLJA_CLW0000004840	
203.	Frazelle, B.M., 03/12/1985	CLJA_CLW0000001182 - 83	
204.	JTC Environmental Consultants, 3/27/1985	CLJA_WATERMODELING_01-0000134144	
205.	Frazelle, B. M., April 8, 1986	CLJA_CLW0000001455	
206.	Operational History of Tarawa Terrace supply well TT- 23, undated	CLJA_WATERMODELING_01- 0000489791 – 92	Objection — Fed R. Evid. 106.
207.	Frazelle, B. M., April 8, 1986	CLJA_CLW00000001455	

208.	Frazelle, B.M., 3/12/1985	CLJA_CLW00000001181-82	
209.	Supply Well Record	CLJA_WATERMODELING_07-0000019001 - 19004	Objection — Fed R. Evid. 802, 901(a).
210.	Feb. 6, 1986, Navy request for comment from EPA	CLJA_CLW0000004922 - 4934	
211.	Well survey sheet	CLJA_CLW00000003544	
212.	Hadnot Point Wells, undated	CLJA_CLW0000005019	
213.	Summary of voc, Chloride, and Flouride Analysis for Hadnot Point and Holcomb Blvd	CLJA_CLW0000001648	Objection — Fed R. Evid. 106.
214.	Chronology, 02/26/1985	CLJA_CLW0000004559	
215.	JTC Environmental	CLJA_CLW0000005608-09	

	Consultants, 2/6/1985		
216.	System: Hadnot Point', undated	CLJA_CLW0000001357	
217.	Hand Drawn Water Diagrams	CLJA_WATERMODELING _07-0000003181	
218.	Hand Drawn Water Diagrams	CLJA_WATERMODELING _07_0000003175	
219.	Comments on ATSDR's site summary for Camp Lejeune	CLJA_WATERMODELIN G_01-0000207550 - 53	
220.	Contaminated Wells at camp Lejeune chart TCE, DCE, and PCE	CLJA_WATERMODELING _01-0000206264	
<u>Phase II Trial Exhibits</u>			
221.	Kidney Cancer Expert Report of Julie E. Goodman, Ph.D.		Objection — Fed. R. Evid. 702, 703, 402, 403. Dr. Goodman's opinions are subject to PLG's pending Mot. to Exclude Dr. Goodman [D.E. 621].
222.	Supplemental Materials Considered List of Julie E. Goodman, Ph.D. – February 7, 2026		Objection — Fed. R. Evid. 702, 703, 402, 403. Dr. Goodman's underlying opinions, on which this list bears, are subject to PLG's pending Mot. to Exclude Dr. Goodman [D.E. 621].
223.	Supplemental Materials Considered List of Julie E. Goodman, Ph.D. – Kidney Cancer – May 19, 2026		Objection — Fed. R. Evid. 702, 703, 402, 403. Dr. Goodman's underlying opinions, on which this list bears,

			are subject to PLG's pending Mot. to Exclude Dr. Goodman [D.E. 621].
224.	Bladder Cancer Expert Report of Julie E. Goodman, Ph.D.		Objection — Fed. R. Evid. 702, 703, 402, 403. Dr. Goodman's opinions are subject to PLG's pending Mot. to Exclude Dr. Goodman [D.E. 621].
225.	Supplemental Materials Considered List of Julie E. Goodman, Ph.D. – Bladder Cancer – May 19, 2026		Objection — Fed. R. Evid. 702, 703, 402, 403. Dr. Goodman's underlying opinions, on which this list bears, are subject to PLG's pending Mot. to Exclude Dr. Goodman [D.E. 621].
226.	Expert Report of Peter G. Shields, M.D.		
227.	Supplemental Materials Considered List of Peter G. Shields, M.D., – May 19, 2026		
228.	Kidney Cancer Expert Report of Michael J. McCabe, Jr., Ph.D.		Objection — Fed. R. Evid. 702, 703, 402, 403. Dr. McCabe's opinions are subject to PLG's pending Mot. to Exclude Dr. McCabe [D.E. 597].
229.	Supplemental Materials Considered List Michael J. McCabe, Jr., Ph.D., – May 19, 2026		Objection — Fed. R. Evid. 702, 703, 402, 403. Dr. McCabe's underlying opinions, on which this list bears, are subject to PLG's pending Mot. to Exclude Dr. McCabe [D.E. 597].
230.	ERRATA – Expert Reports of Michael J. McCabe Jr., Ph.D.		Objection — Fed. R. Evid. 702, 703, 402, 403. Errata to reports whose opinions are subject to PLG's pending Mot. to

			Exclude Dr. McCabe [D.E. 597].
231.	Bladder Cancer Expert Report of Michael J. McCabe, Jr., Ph.D.		Objection — Fed. R. Evid. 702, 703, 402, 403. Dr. McCabe's opinions are subject to PLG's pending Mot. to Exclude Dr. McCabe [D.E. 597].
232.	Expert Report of John C. Lipscomb, Ph.D.		
233.	Supplemental Expert Report of John C. Lipscomb, Ph.D.		
234.	Supplemental Materials Considered List Dr. Lipscomb – May 19, 2026		
235.	National Research Council (U.S.). Committee on Contaminated Drinking Water at Camp Lejeune. (2009). <i>Contaminated Water Supplies at Camp Lejeune: Assessing Potential Health Effects</i> . National Academies Press. https://doi.org/10.17226/12618 .	CLJA_HEALTHEFFECTS-0000000431 - CLJA_HEALTHEFFECTS-0000000769	
236.	Bove, F.J.; Ruckart, P.Z.; Maslia, M.; Larson, T.C. (2014a). Evaluation of mortality among marines and navy personnel exposed to contaminated drinking water at USMC base Camp Lejeune: a retrospective cohort study. <i>Environ. Health</i> , 13, 10. doi:10.1186/1476-069X-13-10.	CLJA_HEALTHEFFECTS-0000692651 - CLJA_HEALTHEFFECTS-0000692664	
237.	Bove, F.J.; Ruckart, P.Z.; Maslia, M.; Larson, T.C. (2014b). Mortality study of civilian employees exposed to contaminated drinking water at USMC Base Camp Lejeune: A retrospective cohort study. <i>Environ. Health</i> 13, 68. doi: 10.1186/1476-069X-13-68.	CLJA_HEALTHEFFECTS-0000000393 - CLJA_HEALTHEFFECTS-0000000405	

238.	Agency for Toxic Substances and Disease Registry (ATSDR). (2017a). ATSDR Assessment of the Evidence for the Drinking Water Contaminants at Camp Lejeune and Specific Cancers and Other Diseases. January 13, 2017.	CLJA_HEALTHEFFECTS-0000044276 - CLJA_HEALTHEFFECTS-0000044427	
239.	Agency for Toxic Substances and Disease Registry (ATSDR). (2017b). Public Health Assessment Camp Lejeune Drinking Water, U.S. Marine Corps Base Camp Lejeune, North Carolina. January 20, 2017.	CLJA_HEALTHEFFECTS-0000000011 - CLJA_HEALTHEFFECTS-0000000212	
240.	Agency for Toxic Substances and Disease Registry (ATSDR). (2018). Morbidity Study of Former Marines, Employees, and Dependents Potentially Exposed to Contaminated Drinking Water at U.S. Marine Corps Base Camp Lejeune. April 2018.	CLJA_HEALTHEFFECTS-0000000214 - CLJA_HEALTHEFFECTS-0000000340	
241.	Bove, F.J.; Greek, A.; Gatiba, R.; Boehm, R.C.; Mohnsen, M.M. (2024a). Evaluation of mortality among Marines, Navy personnel, and civilian workers exposed to contaminated	CLJA_HEALTHEFFECTS-0000109294 - CLJA_HEALTHEFFECTS-0000109392	
	drinking water at USMC base Camp Lejeune: A cohort study. <i>Environ. Health</i> 23(1), 61. doi: 10.1186/s12940-024-01099-7.		
242.	Bove, F.J.; Greek A.; Gatiba, R.; Kohler, B.; Sherman, R.; Shin, G.T.; Bernstein, A. (2024b). Cancer incidence among Marines and Navy personnel and civilian workers exposed to industrial solvents in drinking water at US Marine Corps Base Camp Lejeune: A cohort study. <i>Environ. Health Perspect.</i> 132(10), 107008. doi: 10.1289/EHP14966.		

<u>Plaintiff-Specific Exhibits</u>			
243.	David Fancher 1040 Tax Forms for 2019-22	00275_FANCHER_0000000001-9	
244.	Medical Records from Advanced Dermatology & Cosmetic Surgery dated July 17, 2009	00275_FANCHER_0000000010-24	
245.	Medical Records from Florida Hospital Fish Memorial Laboratory, Volusia Medical Center, Central Florida Urology Associates, and Columbia Medical Center-Sanford dated 1997-2002	00275_FANCHER_0000000025-85	
246.	David Fancher's VA Laboratory Results dated 2015-2023	00275_FANCHER_0000000086-261	
247.	David Fancher Military Service Records, Certificates, and Awards	00275_FANCHER_0000000266-395	
248.	Medical Records from Orlando VAMC dated October 14, 2016	00275_FANCHER_0000000591	
249.	Medical Records from Orlando VAMC dated April 8, 2016	00275_FANCHER_0000000600	
250.	Medical Records from Lake Baldwin VA Clinic dated April 1 and 17, 2015	00275_FANCHER_0000000660	
251.	Medical Records from Orlando VAMC & Lake Baldwin VA Clinic dated 2017	00275_FANCHER_0000000869	
252.	Medical Records from Lake Baldwin VA Clinic dated October 2, 2015	00275_FANCHER_0000001435	
253.	VA Medical Notes dated 2015	00275_FANCHER_0000001484	
254.	David Fancher Military Service Records	00275_FANCHER_0000001621-1850	

255.	Medical Records from Lake Baldwin VA Clinic dated 2016-18	00275_FANCHER_0000001957-2053	
256.	Marriage Certificate	00275_FANCHER_0000002363	
257.	Marriage Certificate	00275_FANCHER_0000002567	
258.	Military Orders from Commanding Officer	00275_FANCHER_0000002799-815	
259.	David Fancher's Military Services Records	00275_FANCHER_0000002816-67	
260.	Medical Records from Lake Baldwin VA Clinic dated 2017	00275_FANCHER_0000002898-953	
261.	VA Radiology Report from Orlando VAMC dated December 10, 2018	00275_FANCHER_0000002954 - 58	
262.	Medical Records from Erlanger Western Carolina Hospital dated October 11, 2024	00275_FANCHER_0000002960-61	
263.	Medical Records from Orlando VAMC dated 2015 - 2021	00275_FANCHER_00000002964 - 3447	
264.	Medical Records from Atlanta VA Medical Center dated 2021-24	00275_FANCHER_00000003448 - 3813	
265.	Medical Records from VHA Orlando Healthcare System dated 2015-21	00275_FANCHER_00000003814 - 4291	
266.	Medical Records from Atlanta VA Medical Center dated 2021-24	00275_FANCHER_00000004302 - 680	
267.	Medical Records from Erlanger Western Carolina Hospital dated October 11, 2024	00275_FANCHER_0000004642-43	
268.	Medical Records from VHA Orlando Healthcare System dated 2015-21	00275_FANCHER_00000006521 - 7062	
269.	Operative and Pathology Reports Orange City Surgery Center dated August 6, 2012	00275_FANCHER_00000007063-66	

270.	Medical Records from Atlanta VA Medical Center dated 2024-25	00275_FANCHER_00000007067-165	
271.	Medical Records from Atlanta VA Medical Center dated 2021-24	00275_FANCHER_0000007166-544	
272.	Medical Records from Murphy Group Practice dated	0275_FANCHER_0000007558-71	
	March 10, 2025 to April 16, 2025		
273.	Medical Records from Murphy Group Practice dated April 16, 2025	0275_FANCHER_0000007632-53	
274.	Medical Records from Orlando VAMC dated 2015-18	00275_FANCHER_0000007578-89	
275.	Medical Records from Erlanger Western Carolina Hospital dated October 10, 2024	00275_FANCHER_0000007609-20	
276.	Excel Sheet of David Fancher Medical Billing Data	00275_FANCHER_0000007621	
277.	Medical Records from Murphy Group Practice dated April 16, 2025	0275_FANCHER_0000007632-53	
278.	Deposition Transcript – David Fancher – January 22, 2024, and accompanying exhibits		
279.	David Fancher’s Military Service Records	00275_FANCHER_NARA_00000001-157	
280.	Office Clinic Notes from Union General Urology dated November 2021 – May 2021	00275_FANCHER_UGH_00000002-15	
281.	Medical Records from Murphy Medical Center Inc. following VA Referral in 2024	00275_FANCHER_MMC_0000001055-95	
282.	VHA Medical Records –	00275_FANCHER_VHA_0000000	

	Allergies	085 - 87	
283.	Laboratory Reports from Orlando VAMC dated 2015-2023	00275_FANCHER_VHA_000 0000 089-260	
284.	Medical Records from Orlando VAMC dated October 2, 2017	00275_FANCHER_VHA_000 0000 529-30	
285.	Medical Records from Orlando VAMC dated October 2, 2015	00275_FANCHER_VHA_000 0000 586-87	
286.	Medical Records from Orlando VAMC dated April 8, 2016	00275_FANCHER_VHA_000 0000 596-97	
287.	Medical Records from Orange City Surgery Center dated August 6, 2012	00275_FANCHER_VHA_000 0000 754-55	
288.	Medical Records from Gastroenterology of Greater Orlando dated August 6, 2012	00275_FANCHER_VHA_000 0000 764-65	
289.	Medical Records from Union General Hospital dated February 5, 2024	00275_FANCHER_VHA_000 0000 772-73	
290.	Medical Records from Union General Hospital dated February 5, 2024	00275_FANCHER_VHA_000 0000 774-76	
291.	Medical Records from Union General Hospital dated November 18, 2021	00275_FANCHER_VHA_000 0000 787-89	
292.	Medical Records from Atlanta VAMC dated April 23, 2021	00275_FANCHER_VHA_000 0000 892-94	
293.	Medical Records from VHA dated 2021 to 2025	00275_FANCHER_VHA_000 0001 670-2138	
294.	David Fancher Military Personnel Record	00275_FANCHER_VBA_0000 001 763 -1928	
295.	David Fancher DD-214 (Release from Active Duty)	00275_FANCHER_VBA_0000 001 930	

296.	Individual Deploy ment Service Records dated December 1982	00275_FANCHER_VBA_0000 002 735	
297.	Medical Records from Lake Baldwin VA Clinic dated December 18, 2015	00275_VA_LMI_0000001589- 91	
298.	VBA Records – <i>Fancher</i>	00275_FANCHER_000000720 8- 9721	
299.	Any demonstrative exhibits		Reserve objections until material provided.
300.	TRICARE Acronyms & Abbreviations	CLJA_TRICARE_0000000012 - CLJA_TRICARE_0000000053	
301.	TRICARE Data (<i>Tukes,</i> <i>Downs, Mousser</i>)	CLJA_TRICARE_0000000054	Objection — Fed. R. Evid. 401, 402, 403; CLJA § 804(e)(2)(A); D.E. 885; inadmissible for any offset purpose.
302.	TRICARE Data Dictionary	CLJA_TRICARE_0000000055	
303.	TRICARE Data (<i>Tukes,</i> <i>Downs, Mousser</i>)	CLJA_TRICARE_0000000056	Objection — Fed. R. Evid. 401, 402, 403; CLJA § 804(e)(2)(A); D.E. 885; inadmissible for any offset purpose.
304.	TRICARE Data Statement	CLJA_TRICARE_0000000005 - CLJA_TRICARE_0000000007	Objection — Fed. R. Evid. 401, 402, 403; CLJA § 804(e)(2)(A); D.E. 885; inadmissible for any offset purpose.
305.	VHA Offsets Data Narrative Summary	CLJA_VHA_0000000002- CLJA_VHA_0000000005	Objection — Fed. R. Evid. 702, 703, 402, 403; CLJA § 804(e)(2)(B); reliability; completeness; waste of time, etc.; D.E. 885.
306.	VHA Offsets Data	CLJA_VHA_0000000006	Objection — Fed. R. Evid. 702, 703, 402, 403; CLJA § 804(e)(2)(B); reliability; completeness; waste of

			time, etc.; D.E. 885.
307.	VHA Offsets Data	CLJA_VHA_0000000007	Objection — Fed. R. Evid. 702, 703, 402, 403; CLJA § 804(e)(2)(B); reliability; completeness; waste of time, etc.; D.E. 885.
308.	VHA Offsets Data Dictionary	CLJA_VHA_0000000008	
309.	Center for Medicare & Medicaid Services, Narrative Summary	CLJA_CMS_0000000127- CLJA_CMS_0000000133	Objection — Fed. R. Evid. 401, 403.
310.	Center for Medicare & Medicaid Services, Medicare Offsets Data and Data Dictionary	CLJA_CMS_0000000134	Objection — Fed. R. Evid. 401, 403.
311.	Center for Medicare & Medicaid Services, Medicare Offsets Data	CLJA_CMS_0000000135	Objection — Fed. R. Evid. 401, 403.
312.	Community Care Network Offsets Data Memorandum	CLJA_CCN_0000000002- CLJA_CCN_0000000004	Objection — Fed. R. Evid. 702, 703, 402, 403; CLJA § 804(e)(2)(B); reliability; completeness; waste of time, etc.; D.E. 885.
313.	Community Care Network Offsets Data	CLJA_CCN_0000000005	Objection — Fed. R. Evid. 702, 703, 402, 403; CLJA § 804(e)(2)(B); reliability; completeness; waste of time, etc.; D.E. 885.
314.	Community Care Network Offsets Data Dictionary	CLJA_CCN_0000000006- CLJA_CCN_0000000008	Objection — Fed. R. Evid. 702, 703, 401, 402, 403; CLJA § 804(e)(2)(B); reliability; completeness; waste of time, etc.; D.E. 860; D.E. 885.
315.	VBA Offsets Data	CLJA_VBA_0000000001- CLJA_VBA_0000000018	Objection — Fed. R. Evid. 702, 703, 401, 402, 403; CLJA § 804(e)(2)(B);

			reliability; completeness; waste of time, etc.; D.E. 860; D.E. 885.
316.	VBA Offsets Data	CLJA_VBA_0000000019	Objection — Fed. R. Evid. 702, 703, 401, 402, 403; CLJA § 804(e)(2)(B); reliability; completeness; waste of time, etc.; D.E. 860; D.E. 885.
317.	VBA Offsets Data Statement	CLJA_VBA_0000000020- CLJA_VBA_0000000022	Objection — Fed. R. Evid. 702, 703, 401, 402, 403; CLJA § 804(e)(2)(B); reliability; completeness; waste of time, etc.; D.E. 860; D.E. 885.
318.	Expert Rep. – Wang Ji, M.D. (Dec. 15, 2025)		
319.	1 st Supp. Expert Rep. – Wang Ji, M.D. (Aug. 9, 2026)		
320.	Materials Considered List of Wang Ji, M.D. (Dec. 22, 2025)		
321.	1 st Supp. Materials Considered List of Wang Ji, M.D. (Jan. 26, 2026)		
322.	2 nd Supp. Materials Considered List of Wang Ji, M.D. (May 13, 2026)		
323.	3 rd Supp. Materials Considered List of Wang Ji, M.D. (Aug. 10, 2026)		
324.	Damages Assessment Form – Fancher – 08/21/24		
325.	1st Am. Damages Assessment Form –		

	Fancher – 10/29/25		
326.	2d Am. Damages Assessment Form – Fancher – 01/20/26		
327.	Expert Rep. – Gregory Russo (<i>Fancher</i>) (Dec. 15, 2025)		
328.	Materials Considered List – Gregory Russo (<i>Fancher</i>) (Dec. 19, 2025)		
329.	<i>Curriculum vitae</i> of Gregory Russo	CLJA_USA_RUSSO_0000000019 (document produced natively; Russo Dep. Ex. 1)	
330.	Supp. Materials Considered List – Gregory Russo – Feb. 20, 2026		
331.	Second Supp. Materials Considered List – Gregory Russo – May 15, 2026		
332.	Russo App’x C Fancher_2026_0203	CLJA_USA_RUSSO_0000000003	
333.	Medicare Physician Fee Schedule (MPFS)	Publicly available (cited in the Reports of Gregory Russo) https://www.cms.gov/apps/physician-fee-schedule/search/search-criteria.aspx	
334.	Medicare PFS Locality Configuration Files	Publicly available (cited in the Reports of Gregory Russo) https://www.cms.gov/apps/physician-fee-schedule/search/search-criteria.aspx	

335.	Medicare Clinical Laboratory Files	Publicly available (cited in the Reports of Gregory Russo) https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/Clinical-Laboratory-Fee-Schedule-Files.html	
336.	Medicare Physician Fee Schedule Relative Value Files	Publicly available (cited in the Reports of Gregory Russo) https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/PhysicianFeeSchedule/PFS-Relative-Value-Files	
337.	American Hospital Directory	Publicly available (cited in the Reports of Gregory Russo) https://www.ahd.com/	
338.	FRE 1006(a) Summary Chart – Offsets – Wang Ji, M.D.	To be provided	Reserve objection until document provided.
339.	Appendix – Offsets Government Payments (<i>Fancher</i>) – Wang Ji, M.D.	JI_USA_0000000013	
340.	Expert Rep. – Tricia Yount (<i>Fancher</i>) (Dec. 15, 2025)		Objection — Fed. R. Evid. 702, 703, 402, 403; D.E. 864; D.E. 860; D.E. 885.
341.	Materials Considered List – Tricia Yount (<i>Fancher</i>) (Dec. 22, 2025)		
342.	<i>Curriculum vitae</i> of Tricia M. Yount, CPA, MAFF	Yount Dep. Ex. 2	
343.	Supp. Materials Considered List – Tricia Yount (Feb. 5, 2026)		
344.	Bureau of Labor Statistics; Consumer Price Index.	Publicly available (cited in the Reports of Tricia Yount)	

345.	<i>High-Grade municipal bonds</i> , Sept. 6, 2025 (U.S. Publishing Office; Congressional Committee Materials).	Publicly available (cited in the Reports of Tricia Yount)	
346.	National Center for Health Statistics, National Vital Statistics Reps., Life Tables, Vol. 74, No. 6 (July 15, 2025)	Publicly available (cited in the Reports of Tricia Yount)	
347.	Social Security Administration. Cost of Living Adjustment (Dec. 2025)	Publicly available (cited in the Reports of Tricia Yount) https://www.ssa.gov/cola	
348.	Nat'l Archives & Recs. Admin., Code of Fed. Regs., <i>Combined Ratings Table</i> (Dec. 2025)	Publicly available (cited in the Reports of Tricia Yount) https://www.ecfr.gov/current/title-38/chapter-I/part-4/subpart-A/section-4.25	
349.	<i>Compensation & Pension, Rate Tables</i> , U.S. Dep't of Vet. Affairs (Dec. 2025)	Publicly available (cited in the Reports of Tricia Yount) https://www.knowva.ebenefits.va.gov/system/templates/selfservice/va_ssnew/help/customer/locate/en-US/portal/554400000001018/topic/554400000005316/Rate-Tables	
350.	<i>Curriculum vitae</i> of Andrew McIlroy	CLJA_USA_MCILROY_00000001-4	
351.	<i>Curriculum vitae</i> of Jadine Piper	CLJA_USA_PIPER_000000001-7	
352.	<i>Curriculum vitae</i> of Daniel J. Clarke, MSA	Clarke Dep. Ex. 4	
353.	<i>Curriculum vitae</i> of Andrea Hartwell	CLJA_USA_HARTWELL_000000001-2	
354.	<i>Curriculum vitae</i> of Carla I. Ryan	Ryan Dep. Ex. 9	

355.	<i>Curriculum vitae</i> of Nicholas Tackaberry, USA (Ret.), PhD(c), MBA, B.Sc.	Tackaberry Dep. Ex. 2	
356.	Expert Report of Judy S. LaKind, Ph.D. In the Matter of <i>Fancher v. United States</i>		
357.	Attachment 1 to the Expert Report of Judy S. LaKind, Ph.D. In the Matter of <i>Fancher v. United States</i>		
358.	Supplemental Report of Judy S. LaKind, Ph.D. – April 18, 2025		
359.	Expert Reports of Judy S. LaKind, Ph.D. [Specific Causation – Bladder Cancer, Kidney Cancer, Leukemia and Non-Hodgkin Lymphoma Plaintiffs] Materials Considered List – April 15, 2025		
360.	Supplemental Materials Considered List Expert Report of Judy S. LaKind, Ph.D. – July 9, 2025		
361.	Second Supplemental Materials Considered List Expert Report of Judy S. LaKind, Ph.D. – May 19, 2026		
362.	FRE 1006(a) Summary Chart – Exposure – Judy LaKind, Ph.D. – <i>Fancher v. United States</i>	To be provided	Reserve objection until document provided.
363.	Expert Report of Lisa A. Bailey, Ph.D. In the Matter of <i>Fancher v. United States</i>		Objection — Fed. R. Evid. 702, 703, 402, 403. Dr. Bailey’s opinions are subject to PLG’s pending Mot. to Exclude Dr. Bailey [D.E. 624].

364.	Materials Considered for Expert Reports of Lisa A. Bailey, Ph.D. (Specific Causation – Bladder Cancer, Kidney Cancer, Leukemia, and Non-Hodgkin's Lymphoma) dated April 15, 2025		
365.	Supplemental Materials Considered List Expert Reports of Lisa Bailey, PhD – June 30, 2025		
366.	Second Supplemental Materials Considered List Expert Reports of Lisa Bailey, PhD – May 19, 2026		
367.	Casarett and Doull's Toxicology: The Basic Science of Poisons (Ninth Edition). (Ed.: Klaassen, CD), McGraw-Hill Education, New York, NY.		Objection — Fed R. Evid. 802
368.	Sept. 26, 2024 Morris Maslia Deposition Exhibit 6 - ATSDR document entitled "Camp Lejeune, Summary of the Water Contamination Situation at Camp Lejeune"		
369.	Aral, Mustafa M. Environmental Modeling and Health Risk Analysis (ACTS/RISK). Springer, 2010.		Objection — Fed R. Evid. 802
370.	Feb. 25, 2025 Leonard Konikow Deposition Exhibit 7 - The Handbook of Groundwater Engineering, Chapter 20 by Lenoard Konikow		Objection — Fed R. Evid. 802

V. DESIGNATION OF PLEADINGS AND DISCOVERY MATERIALS.

Plaintiff and the United States are actively preparing designations of all portions of pleadings and discovery materials, including depositions, interrogatories and requests for admission that each party may offer at trial, as set forth in Local Civil Rule 16.1(c)(4). Further, the Parties are discussing a procedure for making supplemental filings with these designations and objections in advance of trial, and the Parties respectfully intend to provide updates about these proposed procedures for the Court's consideration.

VI. WITNESSES

The Parties have exchanged objections to these witness lists, and those objections are preserved for trial.

A. Plaintiff

NAME	ADDRESS	PROPOSED TESTIMONY	LIVE VS. DESIGNATED
David Fancher	200 Toccoa Farm Road Morganton, GA 30560	All case issues including exposure and damages.	Live
Sheryl Anthos, MD	VHA Orlando Healthcare System, 13800 Veterans Way Orlando, FL 32827	This witness may be called upon to offer testimony regarding her evaluation of Plaintiff, including the VA compensation and pension examination she performed during which she calculated Plaintiff's time at Camp Lejeune.	Live
Anirban Basu, PhD	Department of Pharmacy, School of Pharmacy, University of Washington 1959 NE Pacific Street, Magnuson	This expert may be called to offer rebuttal opinion testimony on the subjects of damages and offsets and kidney cancer.	Live

	Health Sciences Center, Room H-375Q, Box 357630 Seattle, WA, 98195-7630		
Steven B. Bird, MD	6 Laurel Ridge Lane Shrewsbury, MA 01545	This expert may be called upon to offer opinion testimony on the subjects of general causation and kidney cancer.	Live
Daniel Clark	Department of Veterans Affairs Veterans Health Administration – Office of Finance 810 Vermont Avenue, NW Washington, DC 20420	This witness may be called upon to offer testimony on the subjects of damages and offsets and VHA data and cost accounting.	Transcript
R. Jeffrey Davis, P.E., CGWP	Integral Consulting, Inc. 2231 E Murray Holladay Road, Suite 201 Salt Lake City, UT 84117	This expert may be called upon to offer opinion testimony regarding the contaminants in the finished water at U.S. Marine Corps Base Camp Lejeune from 1953 to 1987.	Live
Joseph J. Del Pizzo, MD	Brady Urologic Associates - New York-Presbyterian Hospital 525 E 68 th Street, Starr 918 New York, N.Y. 10021	This expert may be called upon to offer opinion testimony on the subjects of specific causation and kidney cancer.	Live
Humberto Dominguez, MD	Columbia Medical Center 1401 W Seminole Boulevard Sanford, FL 32771	This witness may be called upon to offer testimony regarding Plaintiff's abnormal IVP (intravenous pyelogram), during which there were findings suggestive of a	Live

		mass of the lateral aspect of the right kidney with distortion of the adjacent calices.	
Bridget Fancher	959 Cherokee Avenue SE Atlanta, GA 30315	Plaintiff's daughter has personal knowledge about Plaintiff's health prior to his kidney cancer diagnosis, has personal knowledge about Plaintiff's kidney cancer diagnosis, care and treatment, and has personal knowledge about Plaintiff's current state of health.	Live
Camilla Fancher	200 Toccoa Farm Road Morganton, GA 30560	Plaintiff's wife has personal knowledge about Plaintiff's health prior to his kidney cancer diagnosis, has personal knowledge about Plaintiff's kidney cancer diagnosis, care and treatment, and has personal knowledge about Plaintiff's current state of health.	Live
Joshua Fancher	194 River Road S Blairsville, GA 30512	Plaintiff's son has personal knowledge about Plaintiff's health prior to his kidney cancer diagnosis, has personal knowledge about Plaintiff's kidney cancer diagnosis, care and treatment, and has personal knowledge about Plaintiff's current state of health.	Live
Michael D. Freeman, MD, PhD, MScFMS, MPH	PO Box 96309 Portland, OR 97296 2017 NW Vaughn Street, #96309 Portland, OR 97209	This expert may be called upon to offer opinion testimony on the subject of general causation and kidney cancer.	Live

Jessica Garrett	225 Piedmont Avenue Colonial Heights, VA 23834	Plaintiff's daughter has personal knowledge about Plaintiff's health prior to his kidney cancer diagnosis, has personal knowledge about Plaintiff's kidney cancer diagnosis, care and treatment, and has personal knowledge about Plaintiff's current state of health.	Live
Kathleen M. Gilbert, PhD	240 West 75th Street, Apt 1B New York, NY 10023 800 Shire Court Fort Collins, CO 805	This expert may be called upon to offer opinion testimony on the subjects of general causation and kidney cancer.	Live
Richard Gray, MD	Atlanta VAMC 1670 Clairmont Road Decatur, GA 30033	This witness may be called upon to offer testimony regarding Plaintiff's care and medical treatment, medical expenses, diagnosis, prognosis, the need for future medical care, and the cost of such care.	Live
Marjorie Hackett-Wallace, CFE, RHIA, CHC, CPIP, CPC, CPMA, CDEO, AAPC Fellow	103 Elbridge Road New Britain, CT 06052	This expert may be called upon to offer opinion testimony and rebuttal opinion testimony on the subjects of medical billing, damages and offsets, and kidney cancer.	Live
Andrea Hartwell	Marion VA Medical Center 240 West Main Street Marion, IL 62959	The witness may be called upon to offer testimony on the subjects of damages and offsets and VA, VHA, CCN data.	Transcript
Benjamin Hatten, MD, MPH	Toxicology Associates	This expert may be called upon to offer opinion testimony on the	Live

	26 W Dry Creek Circle, Suite 815 Littleton, CO 80120 Anschutz Medical Campus Department of Emergency Medicine Leprino Building, 7th Floor Campus Box B-21512401 E. 17th Avenue, Aurora, CO 80045	subjects of general causation and kidney cancer.	
Kimberly A. Henderson	300 48 th Street, Virginia Beach, VA 23451	This witness may be called upon to offer testimony regarding the contaminant concentration levels in finished water at Camp Lejeune from 1953 to 1987.	Transcript
Norman L. Jones, PhD (in his absence, his associate R. Jeffrey Davis, P.E., CGWP)	Norm Jones Consulting, LLC 4174 N 430 E Provo, UT 84604 (Integral Consulting Inc. 2231 E Murray Holladay Road, Suite 201 Salt Lake City, UT 84117)	This expert may be called upon to offer opinion testimony regarding the contaminants in the finished water at U.S. Marine Corps Base Camp Lejeune from 1953 to 1987.	Live
Leonard F. Konikow, PhD, NAE	11316 Myrtle Lane Reston, VA 20191	This witness may be called upon to offer testimony regarding the contaminant concentration levels in finished water at Camp Lejeune from 1953 to 1987.	Live
Kyle Longley	1 University Drive Orange, CA 92866	This expert may be called upon to offer opinion testimony on the subjects of general causation and the	Live

		historical use of the Marine Corps Base Camp Lejeune as it related to water consumption.	
Yair Lotan, MD	2001 Inwood Road, WCB3 4th floor Dallas, TX 75390-9110	This expert may be called upon to offer opinion testimony on the subjects of specific causation and kidney cancer.	Live
David Madigan, PhD	27 Colchester St., Brookline, MA 02446	This expert may be called upon to offer rebuttal opinion testimony on the subjects of general causation and kidney cancer.	Live
Timothy M. Mallon, MD, MPH, MS	5959 Logan's Way, Unit 2 Ellicott City, MD 21043	This expert may be called upon to offer opinion testimony on the subjects of general causation and kidney cancer.	Live
Susan Martel	3703 Ivydale Drive, Annandale, VA 22003	This witness may be called upon to offer testimony regarding the contaminant concentration levels in finished water at Camp Lejeune from 1953 to 1987.	Transcript
Jeffrey Martin, MD	Murphy Medical Group/ EWC Urology 75 Medical Park Lane # D Murphy, NC 28906	This witness may be called upon to offer testimony regarding his evaluation and treatment of Plaintiff, including his urology visits in 2025 for kidney/ureteral stones.	Live
Morris L. Maslia, P.E., D.WRE, DEE, Fellow EWRI	M.L. Maslia Consulting 3360 Norfolk Chase Drive Peachtree Corners, GA 30092	This expert may be called to offer opinion testimony regarding the contaminants in the finished water at U.S. Marine Corps Base	

		Camp Lejeune from 1953 to 1987.	
Ziyad Mugharbil, MD	Union General Hospital 35 Hospital Road Blairsville, GA 30512	This witness may be called upon to offer testimony regarding Plaintiff's care and medical treatment, medical expenses, diagnosis, prognosis, the need for future medical care, and the cost of such care.	Live
Jaqueline Oladipo, NP	Orlando VAMC 13800 Veterans Way Orlando, FL 32827	This witness may be called upon to offer testimony regarding Plaintiff's care and medical treatment, medical expenses, diagnosis, prognosis, the need for future medical care, and the cost of such care.	Live
Kelly A. Reynolds, MSPH, PhD	Mel and Enid Zuckerman College of Public Health 295 N. Martin Avenue Tucson, AZ 85724	This expert may be called upon to offer opinion testimony the subjects of water contamination exposure levels, water ingestion modelling, and specific causation.	Live
Christina Riha	1222 E. Fowler Drive Deltona, FL 32725	Plaintiff's daughter has personal knowledge about Plaintiff's health prior to his kidney cancer diagnosis, has personal knowledge about Plaintiff's kidney cancer diagnosis, care and treatment, and has personal knowledge about Plaintiff's current state of health.	Live
Peter Rybolt, MBA	1880 Century Park East, Suite 613 Los Angeles, CA 90067	This expert may be called upon to offer rebuttal opinion testimony on the	Live

		subjects of damages and offsets and kidney cancer.	
David Sabatini, PhD, PE, BCEE	1632 Crestmont Avenue Norman, OK 7306	This expert may be called upon to offer testimony regarding the contaminant concentration levels in finished water at Camp Lejeune from 1953 to 1987.	Live
David Savitz, PhD	6508 Folded Leaf Square Columbia, MD 21044	This expert may be called upon to offer rebuttal opinion testimony on the subjects of general causation and kidney cancer.	Live
Chad L. Staller, J.D., MBA, MAC, CVA	The Center for Forensic Economic Studies 30 Washington Avenue, Suite B2 Haddonfield, NJ 08033	This expert may be called upon to offer opinion testimony and rebuttal opinion testimony on the subjects of damages and offsets, and kidney cancer.	
Matthew John Weiss, MD, MBA, FACS	450 Lakeville Road New Hyde Park, NY 11042	This expert may be called upon to offer opinion testimony on the subjects of specific causation and kidney cancer.	Live
Scott R. Williams	169 E. Winding Way, Wallace, NC 28466	This witness may be called upon to offer testimony regarding the contaminant concentration levels in finished water at Camp Lejeune from 1953 to 1987.	Transcript
Charles Witten, MD	Central Florida Urology Associates 1403 Medical Plaza Drive, Suite 105 Sanford, FL 32771	This witness may be called upon to offer testimony regarding his evaluation and treatment of Plaintiff's renal cell carcinoma, including his	Live

		diagnosis and surgical care in or around 1997, the nephrectomy performed to treat his kidney cancer, and Plaintiff's post-operative course and urologic follow-up. This witness may further testify regarding the nature and extent of the surgery, Plaintiff's surgical recovery, and the physical conditions and complications observed following the procedure, including Plaintiff's persistent abdominal bulge or deformity, his evaluation and follow-up of that condition, and the diagnostic testing he ordered to evaluate the bulge. This witness may also testify regarding Plaintiff's continuing symptoms and physical condition and other matters within his personal knowledge or reflected in his treatment records.	
Gen. Anthony C. Zinni	123 Huntercombe, Williamsburg, VA 23188	This witness may be called upon to offer testimony regarding the contaminant concentration levels in finished water at Camp Lejeune from 1953 to 1987.	Transcript

B. Defendant

NAME	ADDRESS	PROPOSED TESTIMONY	LIVE VS. DESIGNATED
Dr. Alex Spiliotopoulos	Previously provided *All communications must be through counsel*	Dr. Spiliotopoulos may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding the subject matter of water modeling, including his evaluation of the intended purpose, data limitations, reliability, and accuracy of ATSDR's Camp Lejeune water models.	Live
Dr. Remy Hennet	Previously provided *All communications must be through counsel*	Dr. Hennet may offer testimony s under Fed. R. Evid. 702, 703, or 705 regarding the timing and extent of water contamination at Camp Lejeune and his evaluation of the data limitations, reliability, and accuracy of ATSDR's Camp Lejeune water models.	Live

Dr. Jay Brigham	Previously provided *All communications must be through counsel*	Dr. Brigham may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding the water treatment plants that may have supplied contaminated water during the statutory period, and the water treatment plants that were not affected by the contaminants at issue. Dr. Brigham may also offer testimony concerning where water buffaloes at Camp Lejeune were filled; and the opening date of ABC One-Hour Cleaners, which was identified as the source of contamination for Tarawa Terrace.	Live d
Dr. Ari Kelman	Previously provided *All communications must be through counsel*	Dr. Kelman may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding the methodology for conducting historical analyses.	
Dr. Julie Goodman	Previously provided *All communications must be through counsel*	Dr. Goodman may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding general causation for the chemicals at issue in this litigation.	Live

Dr. Peter Shields	Previously provided *All communications must be through counsel*	Dr. Shields may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding carcinogenesis and the general causation methodologies and opinions of plaintiffs' experts regarding the chemicals at issue in this litigation.	Live
Dr. Michael McCabe	Previously provided *All communications must be through counsel*	Dr. McCabe may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding general causation for the chemicals at issue in the litigation.	Live
Dr. Judy LaKind	Previously provided *All communications must be through counsel*	Dr. LaKind may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding exposure assessment for the chemicals at issue in this litigation.	Live
Dr. Lisa Bailey	Previously provided *All communications must be through counsel*	Dr. Bailey may offer testimony under Fed. R. Evid. 702, 703, or 705 on specific causation and how the alleged exposure to contaminants at Camp Lejeune compare to the relevant scientific literature	Live
Camilla Fancher	Previously Provided	Camilla Fancher is Mr. Fancher's wife who may offer fact testimony regarding Mr. Fancher's alleged injuries, exposure, and damages.	By Designation

Bridget Fancher	Previously Provided	Bridget Fancher is Mr. Fancher's daughter who may offer fact testimony regarding Mr. Fancher's alleged injuries, exposure, and damages.	By Designation
Jacqueline Oladipo, ARNP-BC	Previously Provided	Ms. Oladipo is an Advanced Registered Nurse Practitioner with the VA who treated Mr. Fancher's colon polyps. She may offer fact and expert testimony under Fed. R. Evid. 702, 703, or 705 regarding her treatment of Mr. Fancher's colon polyps, including but not limited to, Mr. Fancher's post-procedure surveillance and care and prognosis.	By Designation
Richard Gray, M.D.	Previously Provided	Dr. Gray is Mr. Fancher's treating urologist with Orlando VA Medical Center. He may offer fact and expert testimony under Fed. R. Evid. 702, 703, or 705 regarding his treatment of Mr. Fancher, including but not limited to, Mr. Fancher's post-procedure surveillance and care, kidney cancer etiology, and prognosis.	By Designation

Zayid Mugharbil, M.D.	Previously Provided	Dr. Mugharbil is Mr. Fancher's treating urologist with Union General Hospital. He may offer fact and expert testimony under Fed. R. Evid. 702, 703, or 705 regarding his treatment of Mr. Fancher, including but not limited to, Mr. Fancher's post-procedure surveillance and care and prognosis.	By Designation
Tricia Yount	1000 Johnnie Dodds Boulevard, Suite 103-132 Mount Pleasant, SC 2946 *All communications must be through counsel*	Ms. Yount may offer expert testimony under Fed. R. Evid. 702, 703, or 705 regarding the value of the kidney cancer Plaintiffs' alleged economic damages, past and future medical care that should offset any potential award, past and future VA disability compensation that should offset any potential award.	Live
Dr. Wang Ji, M.D.	1948 San Salvatore Place San Marino, CA 91108 *All communications must be through counsel*	Dr. Ji may offer expert testimony under Fed. R. Evid. 702, 703, or 705 regarding (i) rebutting the opinions of Marjorie Hackett-Wallace as to past	Live

		medical expenses; (ii) offering opinions as to the amount of government healthcare benefits clinically related to the kidney cancer Plaintiffs' claimed conditions; and (iii) offering opinions as to clinically related VBA disability diagnoses or ratings applicable to the kidney cancer Plaintiffs.	
Greg Russo	1800 M Street NW Washington, DC 20036 *All communications must be through counsel*	Mr. Russo may offer expert testimony under Fed. R. Evid. 702, 703, or 705 regarding the reasonable value of medical care and services Plaintiffs allege are related to their kidney cancer.	Live
Heather Ford (VHA)	Previously provided *All communications must be through counsel*	Ms. Ford may offer fact and expert testimony under Fed. R. Evid. 702, 703, or 705 concerning the Veterans Health Administration (VHA) and Office of Integrated Veterans Care (IVC), which are part of the Department	Live

		of Veterans Affairs, that it is reasonable to project that VHA will continue to provide healthcare to Veterans in the future, and that the general scope of care and eligibility for care are unlikely to be significantly constricted in the future.	
Andrew McIlroy (VBA)	U.S. Department of Veterans Affairs 810 Vermont Ave., NW Washington, DC 20420 *All communications must be through counsel*	Mr. McIlroy may offer fact and expert testimony under Fed. R. Evid. 702, 703, or 705 concerning the sources of funding of benefits programs that are administered by the Veterans Benefits Administration (VBA), which is part of the Department of Veterans Affairs.	Live
Jadine Piper (VBA)	Previously provided *All communications must be through counsel*	Ms. Piper may offer fact and expert testimony under Fed. R. Evid. 702, 703, or 705 about Veterans' benefits administered by the Veterans Benefits Administration (VBA), which is part of the Department of Veterans Affairs, including opinions regarding the determination of eligibility for Veterans'	Live

		benefits, the continuation of VBA disability compensation benefits into the future, and whether the scope of such benefits may constrict in the future.	
Daniel Clarke (VHA)	U.S. Department of Veterans Affairs 100 Grandview Road Braintree, MA 02184 *All communications must be through counsel*	Mr. Clarke may offer testimony regarding the Veterans Health Administration (VHA) data that was extracted from database(s) maintained by or on behalf of the Department of Veterans Affairs and the calculations and valuation determinations for the health care costs provided to each kidney cancer Plaintiff receiving health care from the Department of Veterans Affairs.	Live
Andrea Hartwell (IVC)	Previously provided *All communications must be through counsel*	Ms. Hartwell may offer testimony concerning Integrated Veteran Care (IVC) data that was extracted from database(s) maintained by or on behalf of the Department of Veterans Affairs for each kidney cancer Plaintiff receiving community care	Designated, but may call live subject to witness availability

		benefits.	
Nick Tackaberry (VBA)	Previously Provided *All communications must be through counsel*	Mr. Tackaberry may offer testimony concerning disability compensation and disability rating data that was extracted from database(s) maintained by or on behalf of the Veterans Benefits Administration (VBA), which is part of the Department of Veterans Affairs, for each kidney cancer Plaintiff receiving disability compensation for injury(ies) claimed to be from or related to the water at Camp Lejeune.	Designated, but may call live subject to witness availability
Carla Ryan (VBA)	U.S. Department of Veterans Affairs Washington, DC 20015 *All communications must be through counsel*	Ms. Ryan may offer testimony concerning disability compensation and disability rating data that was extracted from database(s) maintained by or on behalf of the Veterans Benefits	Designated, but may call live subject to witness availability

		Administration (VBA), which is part of the Department of Veterans Affairs, for each kidney cancer Plaintiff receiving disability compensation for injury(ies) claimed to be from or related to the water at Camp Lejeune.	
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VII. TRIAL TIME ESTIMATE:

A. Plaintiff

Plaintiff estimates two (2) to three (3) days for the trial of this action, subject to the Court's guidance.

B. Defendant

Given the number of witnesses and exhibits the parties have listed, the United States' position is that the minimum amount of trial time necessary for the individual cases is 40 hours for each side. If the four kidney cancer cases were to be consolidated for trial, the United States' position is that the minimum amount of time necessary to try all four cases is 60 hours for each side.

This 8th day of September, 2026.

Respectfully submitted,

/s/ J. Edward Bell, III

J. Edward Bell, III (admitted *pro hac vice*)
Bell Legal Group, LLC
219 Ridge St.
Georgetown, SC 29440
Telephone: (843) 546-2408
jeb@belllegalgroup.com
Lead Counsel for Plaintiffs

STANLEY E. WOODWARD, JR.
Associate Attorney General

JOHN K. ADAMS
Deputy Associate Attorney General

BRETT A. SHUMATE
Assistant Attorney General
Civil Division

/s/ Robin Greenwald

Robin L. Greenwald (admitted *pro hac vice*)
Weitz & Luxenberg, P.C.
700 Broadway
New York, NY 10003
Telephone: 212-558-5802
rgreenwald@weitzlux.com
Co-Lead Counsel for Plaintiffs

/s/ Elizabeth Cabraser

Elizabeth Cabraser (admitted *pro hac vice*)
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
275 Battery Street, Suite 2900
San Francisco, CA 94111
Phone (415) 956-1000
ecabraser@lchb.com
Co-Lead Counsel for Plaintiffs

/s/ W. Michael Dowling

W. Michael Dowling (NC Bar No. 42790)
The Dowling Firm PLLC
Post Office Box 27843
Raleigh, North Carolina 27611
Telephone: (919) 529-3351
mike@dowlingfirm.com
Co-Lead Counsel for Plaintiffs

/s/ James A. Roberts, III

James A. Roberts, III (N.C. Bar No.: 10495)
Lewis & Roberts, PLLC
3700 Glenwood Avenue, Suite 410
P. O. Box 17529
Raleigh, NC 27619-7529
Telephone: (919) 981-0191
Fax: (919) 981-0199
jar@lewis-roberts.com
Co-Lead Counsel for Plaintiffs

/s/ Mona Lisa Wallace

Mona Lisa Wallace (N.C. Bar No.: 009021)
Wallace & Graham, P.A.
525 North Main Street
Salisbury, North Carolina 28144
Tel: 704-633-5244
Co-Lead Counsel for Plaintiffs

JONATHAN GUYNN
Deputy Assistant Attorney General
Torts Branch

BRIDGET BAILEY LIPSCOMB
Chief
Camp Lejeune Justice Act Section

ADAM BAIN
Chief Litigation Counsel

HAROON ANWAR
Assistant Director

SARA J. MIRSKY
Assistant Director

ELIZABETH PLATT
Senior Trial Counsel

MICHAEL CROMWELL
Senior Trial Counsel

/s/ Erick M. Marquina

ERICK M. MARQUINA
Md. Bar No. 2112140130
Trial Attorney
United States Department of Justice
Civil Division, Torts Branch Camp Lejeune
Unit
1100 L Street, NW Washington, DC 20005
Phone: (202) 340-2572
Fax: (202) 616-4473
Erick.marquina@usdoj.gov
*Attorneys for Defendant,
United States of America*

APPROVED BY:

ROBERT B. JONES, JR.
U.S. MAGISTRATE JUDGE

 , 2026.