

Exhibit 3

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
7:23-CV-897

IN RE:

CAMP LEJEUNE WATER LITIGATION

This Document Relates to: All Cases

UNITED STATES EXPERT
DISCLOSURES: PHASE 1

THE UNITED STATES' DISCLOSURE OF EXPERT TESTIMONY
PURSUANT TO FED. R. CIV. P. 26(a)(2)

The United States, through its attorneys, hereby provide their disclosure of expert testimony under Fed. R. Civ. P. 26(a)(2) and pursuant to the Court's Pretrial Scheduling Order (D.E. 270).

The United States discloses the following witnesses who are retained or specially employed to provide expert testimony in this case under Fed. R. Civ. P. 26(a)(2)(B), and who will provide opinions and testimony consistent with those set forth in their expert reports:

1. Remy Hennes, PhD, PG, CPG
2. Alexandros Spiliotopoulos, PhD
3. Jay Brigham, PhD

On this date, the United States is serving a report for the above listed experts in compliance with Fed. R. Civ. P. 26(a)(2)(B) and this Court's scheduling order. The reports are being served on the Plaintiffs' Leadership Group through the U.S. Department of Justice's Enterprise File Sharing System (JEFS).

Further, pursuant to Fed. R. Civ. P. 26(a)(2)(C), the United States also discloses the following witnesses who may provide testimony under Fed. R. Evid. 702, 703, or 705, but are not required to provide a written report. Under Fed. R. Civ. P. 26(a)(2)(C), the United States now provides a description of the subject matter on which the witness may provide testimony under Fed. R. Evid. 702, 703, or 705 and a summary of the facts and opinions to which the witness may testify at trial.

1. Frank Bove, Ph.D. Dr. Bove, a former senior epidemiologist at ATSDR, may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding the subject matter of the use of ATSDR's water modeling in the ATSDR's epidemiology studies. Dr. Bove may offer opinion testimony under Fed. R. Evid. 702, 703, or 705 regarding the use of ATSDR's water modeling data in epidemiology studies and intended purpose of ATSDR's water modeling of Marine Corps Base Camp Lejeune. Any opinion testimony that Dr. Bove

may offer will be based on his education, his experience working as an epidemiologist, and his work with the ATSDR's water modeling data for Marine Corps Base Camp Lejeune. Dr. Bove provided two days of deposition testimony in this case.

2. Chris Rennix, Ph.D. Dr. Rennix, former Director of Environmental Programs and head of the Epidemiology Data Center at the Navy Environmental Health Command, may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding the subject matter of epidemiology. Dr. Rennix may offer opinion testimony under Fed. R. Evid. 702, 703, or 705 regarding the use of ATSDR's water modeling data in epidemiology studies and the intended use of ATSDR's water modeling of Marine Corps Base Camp Lejeune. Any opinion testimony that Dr. Rennix may offer will be based on his education, his experience working as an epidemiologist, and his work with the ATSDR's water modeling data for Marine Corps Base Camp Lejeune. Dr. Rennix provided one day of deposition testimony in this case.
3. Jason Sautner, MS. Mr. Sautner, an environmental health scientist at ATSDR, may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding the subject matter of water modeling. Mr. Sautner may offer opinion testimony under Fed. R. Evid. 702, 703, or 705 regarding the accuracy, purpose, and potential uses of ATSDR's water modeling of

Marine Corps Base Camp Lejeune, including the proper use of the modeled data, limitations to the water model, and the process of creating ATSDR's model. Any opinion testimony that Mr. Sautner may offer will be based on his education, his experience working as an engineer, and his work on the ATSDR's water modeling of Marine Corps Base Camp Lejeune. Mr. Sautner provided one day of deposition testimony in this case.

4. David A. Savitz, Ph.D. Dr. Savitz, an epidemiologist and chairman of the National Research Council's (NRC) committee evaluating Camp Lejeune's water contamination, may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding the subject matter of the ATSDR's use of and plans for water modeling to support the ATSDR's epidemiological studies. Dr. Savitz may offer opinion testimony under Fed. R. Evid. 702, 703, or 705 regarding the NRC's analysis and review of ATSDR's water modeling at Marine Corps Base Camp Lejeune. Any opinion testimony that Dr. Savitz may offer will be based on his education, his experience working as an epidemiologist, and his work on NRC's Camp Lejeune report. Dr. Savitz provided two days of deposition testimony in this case.
5. Rene Suarez-Soto, MS. Mr. Suarez-Soto, a data scientist at the National Center for Environmental Health and former environmental engineer at ATSDR, may offer testimony under Fed. R. Evid. 702, 703, or 705

regarding the subject matter of water modeling. Mr. Suarez-Soto may offer opinion testimony under Fed. R. Evid. 702, 703, or 705 regarding the accuracy, purpose, and potential uses of ATSDR's water modeling of Marine Corps Base Camp Lejeune, including the proper use of the modeled data, limitations to the water model, and the process of creating ATSDR's model. Any opinion testimony that Mr. Suarez-Soto may offer will be based on his education, his experience working as an engineer, and his work on the ATSDR's water modeling of Marine Corps Base Camp Lejeune. Mr. Suarez-Soto provided one day of deposition testimony in this case.

6. Dan Waddill, PhD. Dr. Waddill, the NAVFAC Atlantic Vieques Restoration Branch Head and former NAVFAC Environmental Restoration program supervisor, may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding the subject-matter of water modeling. Dr. Waddill may offer opinion testimony under Fed. R. Evid. 702, 703, or 705 regarding the reliability and accuracy of ATSDR's water modeling of Marine Corps Base Camp Lejeune, including the proper use of data, sufficiency of ATSDR's assumptions, and the appropriate use of hindcasting models. Any opinion testimony that Dr. Waddill may offer will be based on his education, his experience working as an engineer, and his work in providing feedback on

the ATSDR's water modeling of Marine Corps Base Camp Lejeune. Dr. Waddill provided one day of deposition testimony in this matter.

The United States reserves the right to elicit opinions from experts disclosed by any other party in this litigation.

Dated: December 9, 2024

Respectfully submitted,

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s/ Adam Bain
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CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2024, the foregoing was served on counsel of record via electronic mail.

/s/ Adam Bain

ADAM BAIN

Special Litigation Counsel, Torts Branch
Environmental Torts Litigation
U.S. Department of Justice