

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
NO. 7:23-CV-00897**

**IN RE:
CAMP LEJEUNE WATER LITIGATION**

NOTICE OF DISCLOSURE

**This Document Relates To:
ALL CASES**

The United States submits the following information in response to the Court’s question at the February 13, 2026, hearing regarding whether the Environmental Protection Agency (“EPA”) and Agency for Toxic Substances and Disease Registry (“ATSDR”) studies on which Dr. Lisa Bailey relied were disclosed as part of the United States’ Phase II disclosures. *See* Feb. 13, 2026, Hr’g Tr. at 73:13-15, 73:21-24. As the charts below show, the EPA and ATSDR studies were referenced in the reports of two of the United States’ Phase II experts: (1) Dr. John Lipscomb, Ph.D., DABT, FATS, who cited the reports and opined that regulatory risk values were not applicable to determining general causation, and (2) Dr. Julie Goodman, Ph.D., DABT, FACE, ATS, who opined on general causation for all five Track 1 Diseases.

The first chart contains the EPA reports that Dr. Bailey relied on in her reports for Track 1 Plaintiffs. In her reports for Track 1 Plaintiffs alleging Parkinson’s disease, Dr. Bailey also relied on ATSDR reports. The second chart contains these ATSDR reports.

The first column of the charts contains the full citation of the report. The second column of the charts cites an example of where Dr. Bailey cited the report in one of her Track 1 Plaintiff reports. The third column of the charts provides the citation of that report in Dr. Lipscomb’s Phase II report. The fourth column of the charts provides the citation of the report in Dr. Goodman’s Phase II reports.

EPA document relied on by Dr. Bailey	Bailey Rep. (Connard) Citation and Page Number	Lipscomb Rep. Citation and Page Number	Goodman Rep. Citation and Page Number
<p>TCE</p> <p>US EPA. 2011. “IRIS Chemical Assessment Summary for Trichloroethylene (CAS No. 79-01-6).” 65p., September 28. Accessed at https://www.epa.gov/iris.</p>	<p>US EPA. 2011b (p. 25)</p>	<p>EPA 2011a (pp. 13, 19, 44, 47, 79, 83)</p>	<p>US EPA. 2011 (Bladder cancer pp. A-1, 19, 36, 57; NHL pp. A-1, 19, 36, 58, 60, 62, 64, 107; Kidney cancer pp. A-1, D-28, 2, 19, 35, 52, 54–55, 57, 61, 63, 64; Leukemia pp. A-1, 20, 38, 60, 62, 64–65, 115; PD pp. A-1, 19, 63–64, 66, 78, 104, 127–28)</p>
<p>PCE</p> <p>US EPA. 2012. “Toxicological Review of Tetrachloroethylene (Perchloroethylene) (CAS No. 127-18-4) in Support of Summary Information on the Integrated Risk Information System (IRIS) (Final).”EPA/635/R- 08/011F, 1077p., February.</p>	<p>US EPA. 2012b (p. 27)</p>	<p>EPA 2012c (p. 13)</p>	<p>US EPA 2012 (Bladder cancer pp. A-4, 67–68, 71–72; NHL pp. A-4, 19, 70–71, 73–75, 76; Kidney cancer pp. A-4, 19, 71–72, 74; Leukemia pp. A-4, 20, 71–74, 75–76, 77, 115; PD pp. A-4, 19, 69, 79–80, 127–28)</p>
<p>Benzene</p> <p>US EPA. 2003. “IRIS Chemical Assessment Summary for Benzene (CAS No. 71-43-2).” 43p., April 17. Accessed at https://www.epa.gov/iris.</p>	<p>US EPA. 2003a (p. 28)</p>	<p>EPA 2000b (updated 2003)(p. 13)</p>	<p>US EPA 2003 (NHL pp. A-7, 89, 91, 92, 94, 108; Leukemia pp. A-7)</p>
<p>Vinyl Chloride</p> <ul style="list-style-type: none"> • US EPA. 2003. “IRIS Chemical Assessment Summary for Vinyl Chloride (CAS No. 75-01-4).” 63p., October 28. Accessed at https://www.epa.gov/iris. • US EPA. 2000. “Toxicological Review of Vinyl Chloride (CAS No. 75-01-4).”EPA/635/R-00/004. 197 p., May. 	<ul style="list-style-type: none"> • US EPA. 2003b (p. 29) • US EPA. 2000 (p. 29) 	<ul style="list-style-type: none"> • EPA 2000a; (p. 11, 13) 	<ul style="list-style-type: none"> • US EPA 2000c (Bladder cancer p. 120; Leukemia p. A-9, 107, 109, 111, 116, 146) • US EPA 2000a (NHL pp. 136, A-9, 99, 101, 103, 108; Kidney cancer pp. A-9, 86; Leukemia pp. A-7, 147; PD pp. A-9, 153)

ATSDR document relied on by Dr. Bailey	Bailey Rep. (McElhiney) Citation and Page Number	Lipscomb Rep. Citation and Page Number	Goodman Rep. Citation and Page Number
<p>TCE</p> <p>ATSDR 2019 "Toxicological Profile for Trichloroethylene." 511p., June. Accessed at https://www.atsdr.cdc.gov/ToxProfiles/tp19.pdf.</p>	<p>ATSDR 2019a (p. 26)</p>	<p>ATSDR 2019a (p. 11, 13, 47, 79)</p>	<p>ATSDR 2019a (Bladder cancer pp. 56, 61, 62, 67, 68, 95; Kidney cancer pp. 35, 57, 63, 64, 97; PD pp. 46, 55, 66, 104, 117, 126, 127, 135, 138)</p> <p>ATSDR 2019b (NHL pp. 36, 58, 60–61, 64, 107, 110; Leukemia pp. 38, 60, 62–63, 65, 115, 118)</p>
<p>PCE</p> <p>ATSDR 2019 "Toxicological Profile for Tetrachloroethylene." 435p., June. Accessed at https://www.atsdr.cdc.gov/ToxProfiles/tp18.pdf.</p>	<p>ATSDR 2019b (p. 29)</p>	<p>ATSDR 2019b (p. 13, 45, 79,)</p>	<p>ATSDR 2019b (Bladder cancer pp. 19, 36, 53, 56–57, 69, 72, 73, 95; Kidney cancer pp. 19, 97; PD pp. 19, 69, 78, 127, 138)</p> <p>ATSDR 2019a (NHL pp. 19, 70, 71, 73, 107, 110; Leukemia pp. 20, 71, 72, 74, 115, 118)</p>
<p>Benzene</p> <p>ATSDR 2007 "Toxicological Profile for Benzene." 438p., August.</p>	<p>ATSDR 2007a (p. 31)</p>	<p>ATSDR 2007 (p. 13, 80)</p>	<p>ATSDR 2007a (Bladder cancer pp. A-7, 78, 79, 80, 81, 94; Kidney cancer pp. A-7, 81, 82, 96; PD pp. A-7, 33, 36, 82, 88, 138)</p> <p>ATSDR 2007b (NHL pp. A-7, 89, 91, 94, 108, 109; Leukemia pp. A-7, 96, 98, 117)</p>
<p>Vinyl Chloride</p> <p>ATSDR 2024 "Toxicological Profile for Vinyl Chloride (Final)." 312p., January. Accessed at https://wwwn.cdc.gov/TSP/ToxProfiles/ToxProfiles.aspx?id=282&tid=51.</p>	<p>ATSDR 2024b (p. 34)</p>	<p>ATSDR 2024 (p. 80)</p>	<p>ATSDR 2024a (Bladder cancer pp. 19, 33, 85, 95)</p> <p>ATSDR 2024b (NHL pp. 19, 78, 89, 99, 101, 103, 108, 109; Kidney cancer pp. 19, 86, 88, 90, 97; Leukemia pp. 20, 107, 118)</p>

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CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2026, I electronically filed the foregoing using the Court's Electronic Case Filing system, which will send notice to all counsel of record.

/s/ Joshua G. Carpenito
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