

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

IN RE:)
CAMP LEJEUNE WATER LITIGATION)
)
This Document Relates to:)
)
Bruce Hill v. USA, 7:23-CV-028)
Jimmy Laramore v. USA, 7:23-CV-594)
Frank Mousser v. USA, 7:23-CV-667)
Jacqueline Tukes v. USA, 7:23-CV-1553)
Gary McElhiney v. USA, 7:23-CV-1368)
Edgar Peterson v. USA, 7:23-CV-1576)
Diane Rothchild v. USA, 7:23-CV-858)
Richard Sparks v. USA, 7:23-CV-682)

**PLAINTIFFS’ MOTION TO EXCLUDE CERTAIN OPINIONS OF DEFENDANT’S
PHASE III ECONOMIC EXPERTS DUBRAVKA TOSIC, TRICIA YOUNT, AND
ANDREW BROD**

Plaintiffs hereby move the Court, pursuant to Federal Rule of Evidence 702 and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993), to exclude, in part, the reports of Defendant’s economic experts Dubravka Tasic, Ph.D. (“Tasic”), Tricia M. Yount, CPA, MAFF (“Yount”), and Andrew Brod, Ph.D. (“Brod”). Plaintiffs seek to exclude these experts’ opinions only to the extent they seek to quantify future medical offset projections under the Medicare, Veterans Health Administration (VHA), and/or TRICARE programs for eight of the Track 1 Bellwether Plaintiffs: Bruce Hill, Jimmy Laramore, Frank Mousser, Jacqueline Tukes, Gary McElhiney, Edgar Peterson, Diane Rothchild, and Richard Sparks. Specifically, Plaintiffs seek to exclude the following report portions and related testimony:

1. Tasic Rep. (Hill), limited to all portions that quantify Mr. Hill’s future medical offsets. Tasic Rep. (Hill), at 20-25, App’x A Tables 9-16 (JA Ex. 708).
2. Yount Rep. (Laramore), limited to all portions that quantify Mr. Laramore’s future medical offsets. Yount Rep. (Laramore) at 3-4, Table 2 (JA Ex. 725).

3. Yount Rep. (Mousser), limited to all portions that quantify Mr. Mousser's future medical offsets. Yount Rep. (Mousser) at 4-6, Table 3 (JA Ex. 726).
4. Yount Rep. (Tukes), limited to all portions that quantify Ms. Tukes' future medical offsets. Yount Rep. (Tukes) at 4-5, Table 2 (JA Ex. 727).
5. Brod Rep. (McElhiney), limited to all portions that quantify Mr. McElhiney's future medical offsets. Brod Rep. (McElhiney) at 4-9, Tables D, E, F, G, App'x A at 4-11 (JA Ex. 641).
6. Brod Rep. (Peterson), limited to all portions that quantify Mr. Peterson's future medical offsets. Brod Rep. (Peterson) at 5-7, Tables C, D, E, F, App'x A at 5-12 (JA Ex. 642).
7. Brod Rep. (Sparks), limited to all portions that quantify Mr. Sparks' future medical offsets. Brod Rep. (Sparks) at 4-6, Tables C, D, App'x A at 4-7 (JA Ex. 644).
8. Brod Rep. (Rothchild), limited to all portions that quantify Ms. Rothchild's future medical offsets. See *id.* at 4-6, Tables C, D, App'x A at 3-6 (JA Ex. 643).

The grounds for this motion are set forth in the Memorandum of Law filed contemporaneously with this motion.

[Signatures follow on next page]

DATED this 27th day of April, 2026.

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