

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 Pleading Relates to:)
ALL CASES)

**INDEX OF EXHIBITS
TO PLAINTIFFS’ LEADERSHIP GROUP’S MEMORANDUM OF LAW
IN SUPPORT OF MOTION TO COMPEL DOCUMENT PRODUCTION IN RESPONSE
TO FIRST SET OF REQUEST FOR PRODUCTION**

- Exhibit 1: Plaintiffs’ First Request for Production of Documents
- Exhibit 2: Plaintiffs’ Corrected First Request for Production of Documents
- Exhibit 3: Defendant’s Responses to Plaintiffs’ Corrected First Request for Production of Documents
- Exhibit 4: Plaintiffs’ Discovery Deficiency Letter to Defendant of November 3, 2023
- Exhibit 5: Defendant’s Discovery Letter to Plaintiffs of November 4, 2023
- Exhibit 6: Plaintiffs’ Discovery Deficiency Letter to Defendant of November 6, 2023
- Exhibit 7: Defendant’s Discovery Letter to Plaintiffs of November 8, 2023
- Exhibit 8: Defendant’s Discovery Letter to Plaintiffs of November 27, 2023
- Exhibit 9: Plaintiffs’ Discovery Deficiency Letter to Defendant of December 4, 2023
- Exhibit 10: Chart Summarizing Deficiencies with Defendant’s Discovery Responses
- Exhibit 11:¹ Transcript of Deposition of Rule 30(b)(6) Designee of the ATSDR

¹ Exhibits 11, 12 & 15 to the present motion to compel have been designated as containing “Confidential Information” pursuant to the Stipulated Protective Order [D.E. 36]. The Plaintiffs’ Leadership Group (“PLG”) does not believe that these exhibits actually contain confidential information. However, the PLG is not publicly filing Exhibits 11, 12 & 15 at the present time. The PLG will provide these exhibits to the Court for *in camera* review.

- Exhibit 12: Transcript of Deposition of Rule 30(b)(6) Designee of the VA
- Exhibit 13: Transcript of Status Conference Hearing on April 5, 2023
- Exhibit 14: Transcript of Status Conference Hearing on October 30, 2023
- Exhibit 15: Index of Documents Possessed by the ATSDR and Related to Camp Lejeune (“Exhibit 4” to the Deposition of Rule 30(b)(6) Designee of the ATSDR)
- Exhibit 16: Defendant’s Discovery Letter to Plaintiffs of December 12, 2023