

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

IN RE:)
CAMP LEJEUNE WATER LITIGATION) Case No: 7:23-cv-897
)
)
This Document Relates To:)
ALL CASES)

DECLARATION OF NATHAN BU

I, Nathan Bu, declare pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct under penalty of perjury:

1. I am a Trial Attorney for the United States Department of Justice. I have entered an appearance in this case. The facts set forth in this declaration are within my personal knowledge or based on documents and information that I have received in the course of litigating this case. Specifically, I am familiar with the documents attached as exhibits to the United States' Opposition to Plaintiffs' Leadership Group's Motion to Enforce CMO-2.

2. Exhibit A is a list of cases that (1) alleged a Track 1 Illness; (2) had a Short Form Complaint filed between September 26, 2023 and November 6, 2023; and (3) did not affirmatively provide an opt-out notice before November 6, 2023. This list was generated from information retrieved from the court-ordered Rubris Crosslink database as of December 18, 2023.

3. Exhibit B is a list of cases that (1) alleged a Track 1 Illness; (2) had a Short Form Complaint filed between November 7, 2023 and November 13, 2023 *or* affirmatively provided an opt-out notice before November 6, 2023; and (3) are not represented by Foster Law LLC. This list was generated from information retrieved from the court-ordered Rubris Crosslink database as of December 18, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Nathan Bu

NATHAN BU

Trial Attorney, Torts Branch
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CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2023, a copy of the foregoing document was filed via the Court's ECF system and served on counsel of record through the ECF system.

/s/ Nathan Bu
NATHAN BU