

Exhibit C

Plaintiffs' Leadership Group's First Set of Interrogatories to Defendant United States of America Concerning Track 1 Discovery Pool Plaintiffs

**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:)
Track 1 Discovery Plaintiffs)

**PLAINTIFFS’ LEADERSHIP GROUP’S FIRST SET OF INTERROGATORIES TO
DEFENDANT UNITED STATES OF AMERICA CONCERNING TRACK 1
DISCOVERY POOL PLAINTIFFS**

Plaintiffs’ Leadership Group (“PLG”) hereby serves on Defendant United States of America (“Defendant”), pursuant to Fed. R. Civ. P. 26 and 33, the following interrogatories (the “Discovery Requests”).

These Discovery Requests should be deemed to be separately served as to each of the 100 plaintiffs who are identified as Track 1 Discovery Pool Plaintiffs. *See* Docs. 69, 75.¹ For clarity, the PLG requests a separate response from Defendant concerning each of the Track 1 Discovery Pool Plaintiffs.

DEFINITIONS AND INSTRUCTIONS

1. “Concerning” means referring to, describing, evidencing, or constituting.
2. “Document” carries its broadest meaning consistent with Fed. R. Civ. P. 26 and 34, and includes ESI, paper documents, imaged hard copy documents, and tangible things.

¹ The present Discovery Requests are served without prejudice to Plaintiffs’ contention that Defendant has listed for the Track 1 Discovery Pool certain plaintiffs who were ineligible for selection as Track 1 Plaintiffs. Doc. 78. In the event that certain of Defendant’s Track 1 Discovery Pool selections are stricken, these Discovery Requests shall be deemed as having been served concerning the replacement selections.

3. “Electronically stored information” (“ESI”) shall carry its broadest possible meaning consistent with Fed. R. Civ. P. 26 and 34. ESI also includes relevant, proportional, evidentiary metadata. ESI excludes information in paper form or that originated in paper form and was scanned to digital form (also known as “imaged hard copy documents”).

4. “Identify” as to humans means to provide the name, address, phone number, email address, occupation, employer, and any other pertinent information that would assist in locating an individual to inquire as to their knowledge. “Identify” as to documents—including videos, audio recordings, transcripts or any other recording medium—means to provide the name of the document, title, date, author, location, page number and any other available information that will assist in locating the document.

5. Please note that the term “Plaintiff” as used in these Discovery Requests refers to the individual defined as “Plaintiff” on page 2 of the Short Form Complaint.

6. “Relevant” or “potentially relevant ESI” means any ESI concerning any claim or defense at issue in this case, or any matter relating thereto.

7. The term “Service Member” is intended to reference the Plaintiff in the case of Plaintiffs who were service members at Camp Lejeune, the Plaintiff’s spouse in the case of Plaintiffs who were spouses of military service members at Camp Lejeune, and the Plaintiff’s parent for “in utero” exposure cases, if any.

8. “Short Form Complaint” refers to each respective Track 1 Discovery Pool Plaintiff’s short form complaint filed in each such plaintiff’s respective individual case docket.

INTERROGATORIES

1. Please provide the names and addresses of persons known to Defendant or counsel to be witnesses concerning the facts of the case and indicate whether or not written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.

RESPONSE:

2. Please provide the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the Defendant may use to support its defenses as to the claim of the Plaintiff (or Plaintiff's Decedent), unless the use would be solely for impeachment.

RESPONSE:

3. If Defendant denies that Plaintiff (or Decedent) was exposed to contaminated water at Camp Lejeune for the time period alleged at Short Form Complaint paragraphs 13 and 14, then please a) identify all facts on which Defendant relies to support that denial, b) identify the individuals with knowledge supporting your denial, and c) identify the documents relied upon to support any such denial.

RESPONSE:

4. If Defendant denies that Plaintiff (or Decedent) suffered any of the illnesses or conditions alleged in paragraph 19 of Plaintiff's Short Form Complaint as a result of exposure to contaminated water at Camp Lejeune, then please a) identify all facts on which Defendant relies

to support that denial, b) identify the individuals with knowledge supporting your denial, and c) identify the documents relied upon to support any such denial.

RESPONSE:

5. If Defendant denies any allegation in Plaintiff's Short Form Complaint, then please a) identify all facts on which Defendant relies to support that denial, b) identify the individuals with knowledge supporting your contention, and c) identify the documents relied upon to support such denial.

RESPONSE:

6. Identify each person who you expect to call as an expert witness at the trial of this action and state the subject matter on which the expert(s) is expected to testify, the substance of the facts and opinions to which the expert is expected to testify, and a summary of the grounds for each opinion.

RESPONSE:

Respectfully submitted this 22nd day of December, 2023.

/s/ J. Edward Bell, III

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CERTIFICATE OF SERVICE

This is to certify that on the below-indicated date, I served a copy of the foregoing document upon counsel for the Defendant by electronic mail at the following electronic mail address: adam.bain@usdoj.gov.

/s/ J. Edward Bell, III _____

J. Edward Bell, III

Lead Counsel for Plaintiffs

Date: December 22, 2023