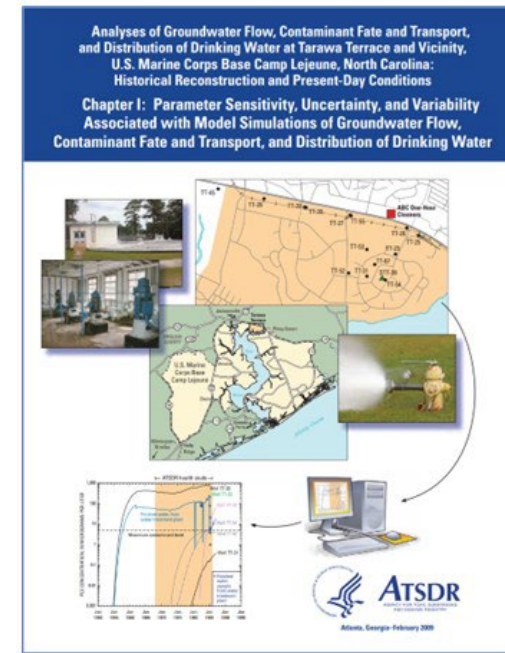


# EXHIBIT 2

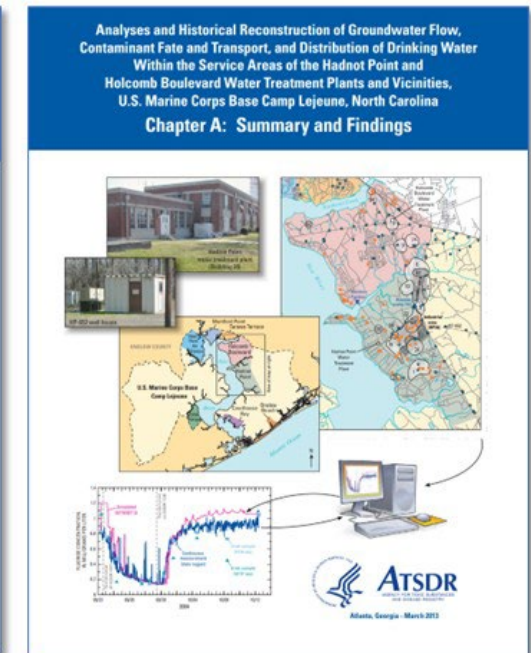
# ATSDR Water Model Project

- ATSDR Water Model Project consists of all material associated with the creation of the Tarawa Terrace and Hadnot Point/Holcomb Blvd water models which include:
  - Both site's water model input & output files
  - Geographic Information System (GIS) Project
  - Multiple document collections
  - Research material & other documents/data relied upon to create the models
- The water model projects represent thousands to tens of thousands of individual files

## ATSDR Water Model Project



Tarawa Terrace  
Water Model

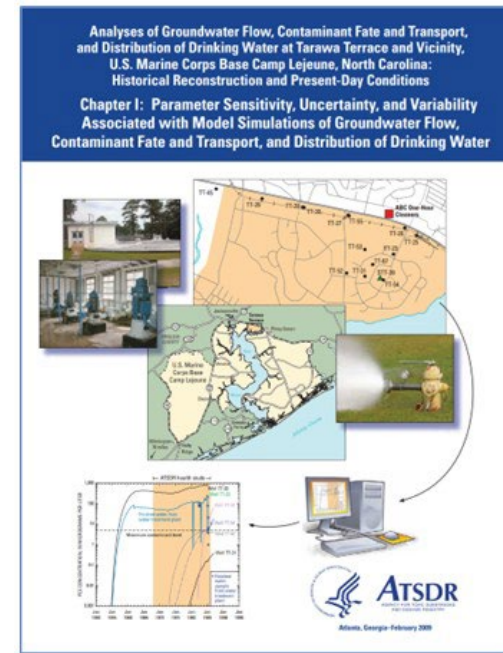


Hadnot Point - Holcomb Blvd  
Water Model

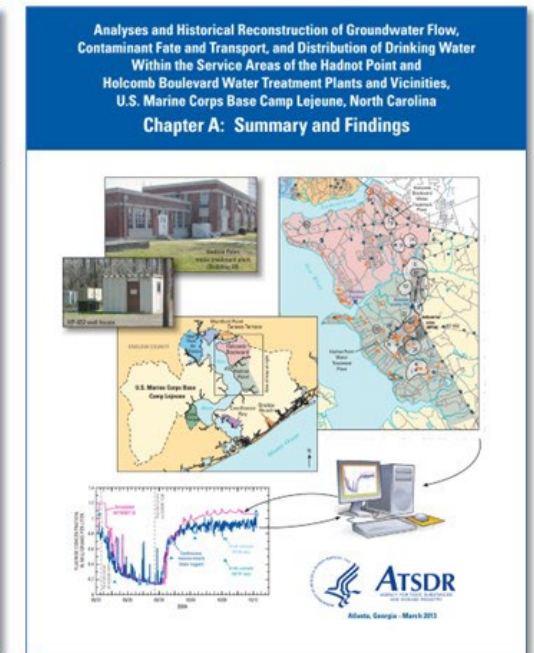
# ATSDR Water Model Project

- Plaintiff's consultants and experts need to be able to have access to the ATSDR Water Model Project in its original form to allow them to:
  - Evaluate and fully understand the methodology the ATSDR scientists used in developing the model
  - Evaluate the model's input and output files
- The only way this can be accomplished is to have the Project in its original form

## ATSDR Water Model Project

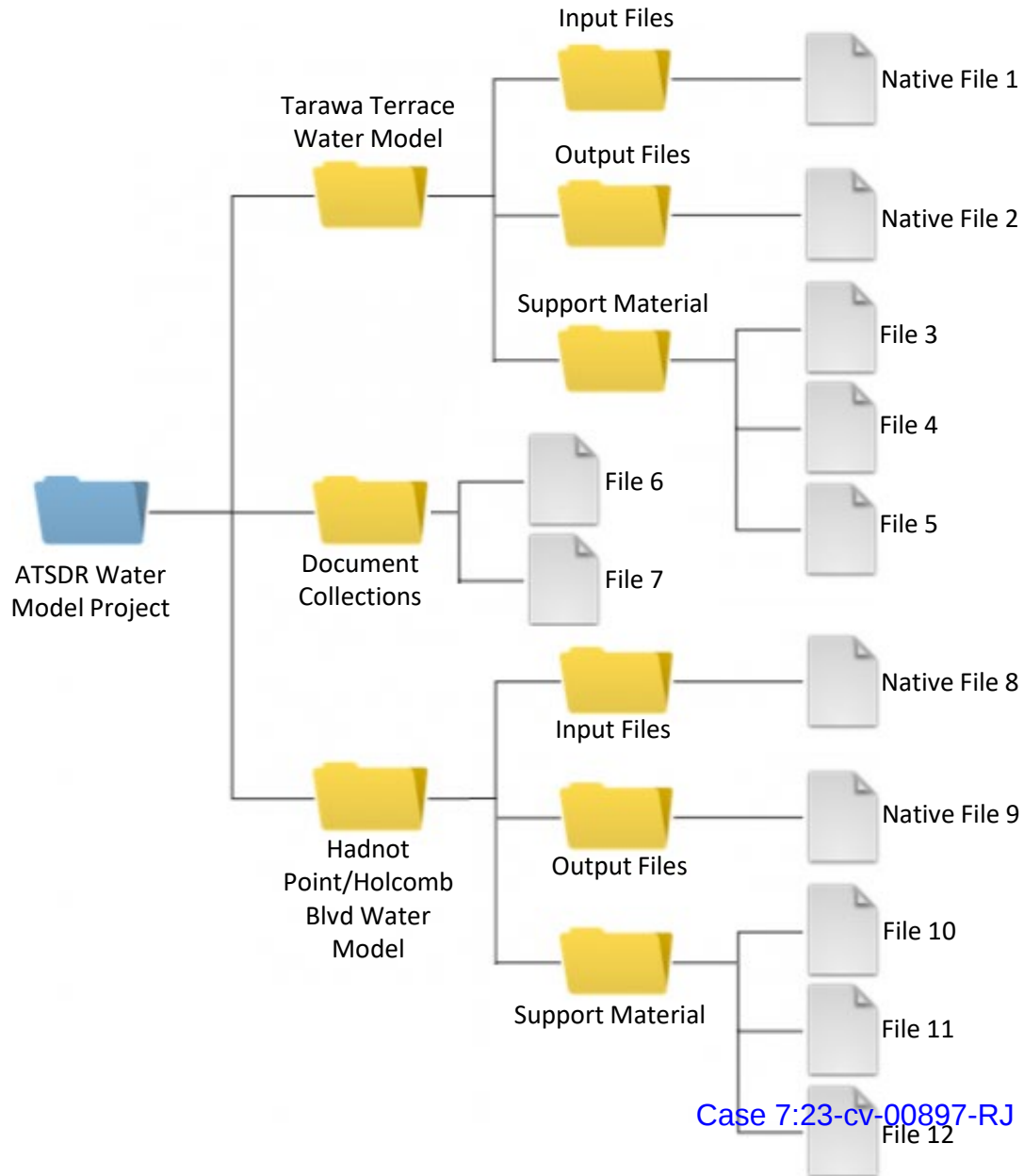


Tarawa Terrace  
Water Model

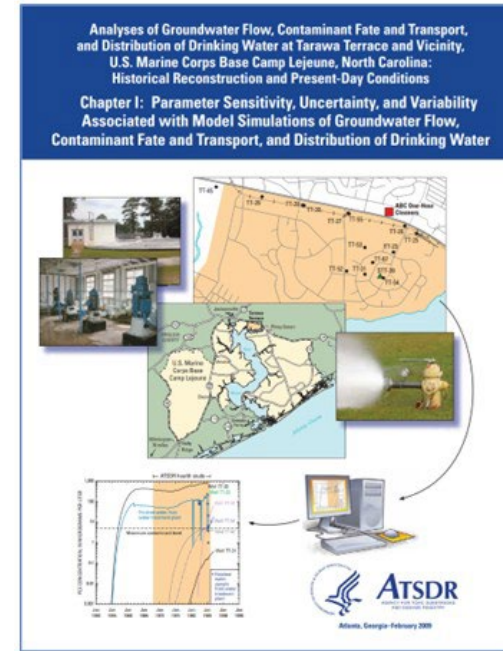


Hadnot Point – Holcomb Blvd  
Water Model

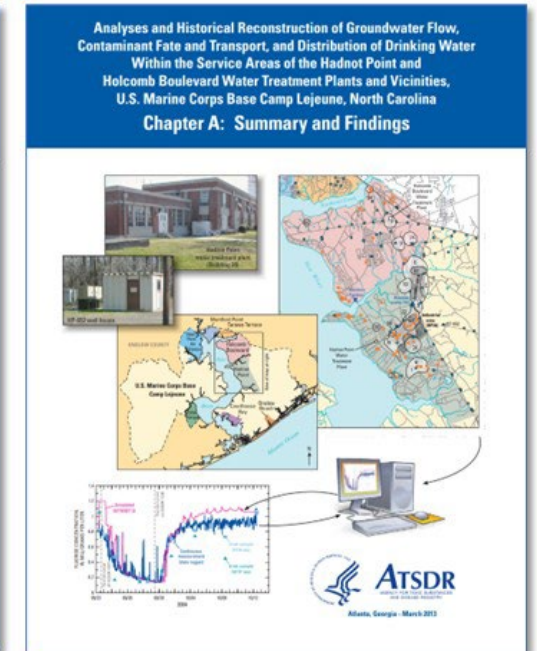
# ATSDR Water Model Project



## ATSDR Water Model Project



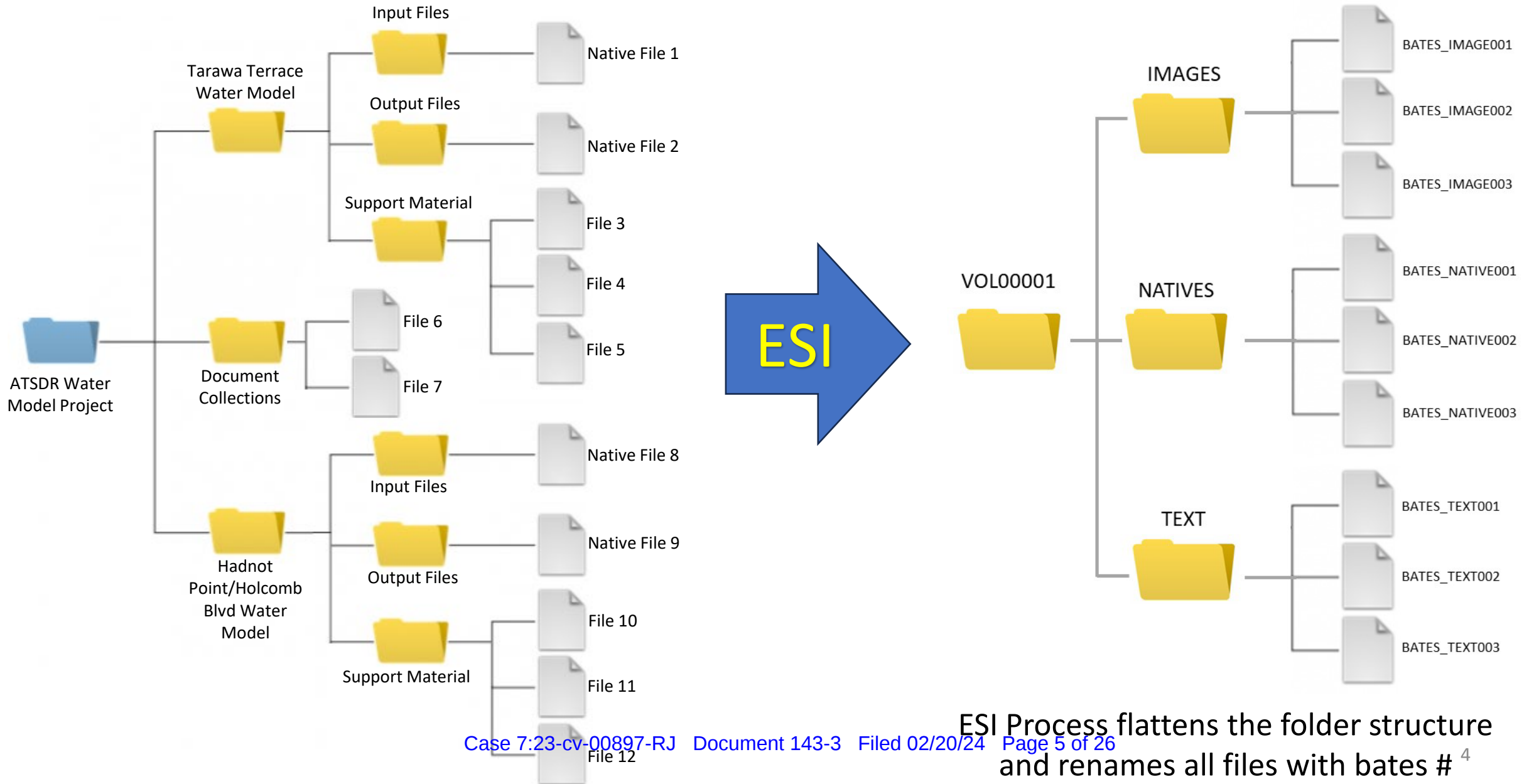
Tarawa Terrace Water Model



Hadnot Point – Holcomb Blvd Water Model

The graphic to the left represents the folder-subfolder-file structure of the ATSDR water Model Project. The actual structure will be much more extensive.

# ATSDR Water Model Project





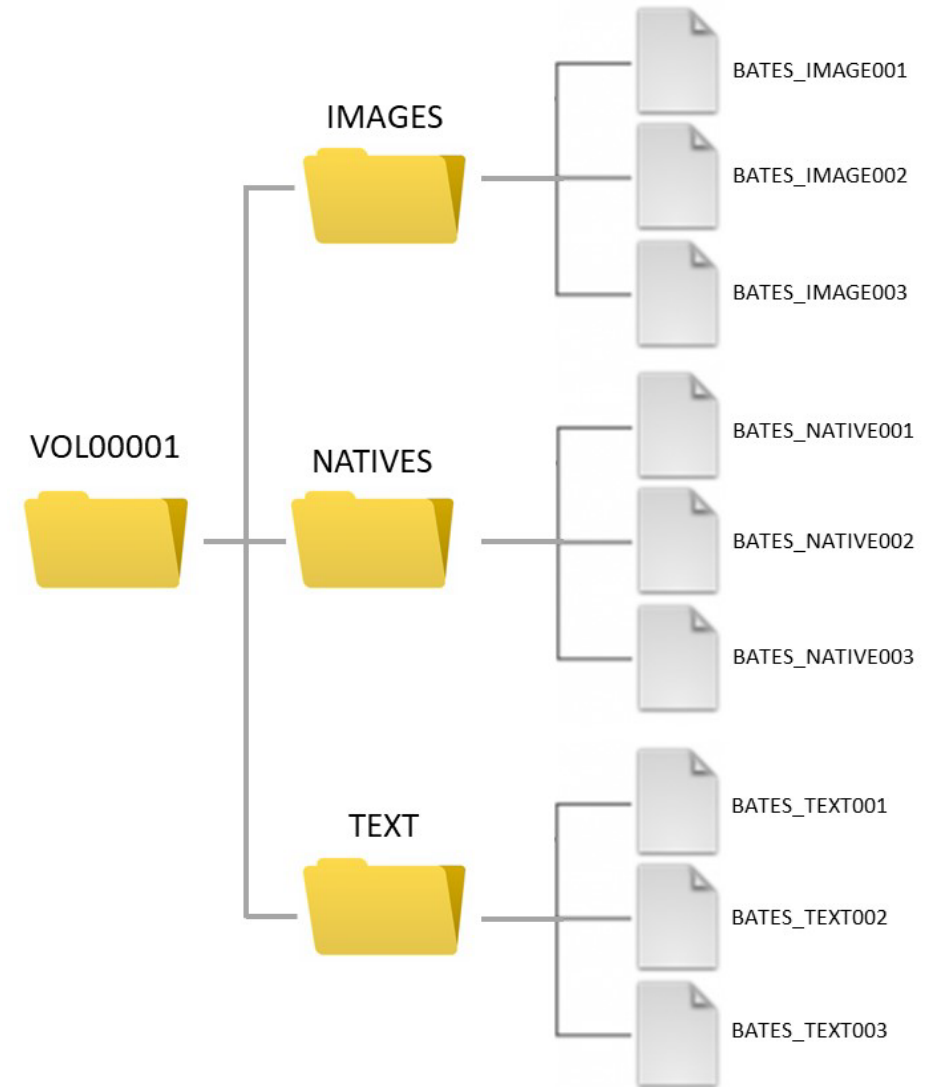
# ATSDR Water Model Project

BEGDOC#	FILENAME
CLJA_WATERMODELING-0000000001	ChA FigA4.1_TCE HPIA layer1.pdf
CLJA_WATERMODELING-0000000002	Table1_ResultsSummary (002).docx
CLJA_WATERMODELING-0000000003	ChA FigA16.pdf
CLJA_WATERMODELING-0000000004	ChA FigA17.pdf
CLJA_WATERMODELING-0000000005	ChA FigA6.1_TCE HP landfill layer1.pdf
CLJA_WATERMODELING-0000000006	ChD FigD7-8_Bldg645 benzene USTP.pdf
CLJA_WATERMODELING-0000000008	ChA Fig13-14.pdf
CLJA_WATERMODELING-0000000010	ChA FigA5.1_benzene HPIA layer1.pdf
CLJA_WATERMODELING-0000000011	Camp Lejeune SVI_20170717.docx
CLJA_WATERMODELING-0000000012	ChA Sup3 FigS3.21_Pot surface.pdf
CLJA_WATERMODELING-0000000013	ChA FigA6.4_PCE HP landfill layer1.pdf

Bates File Name

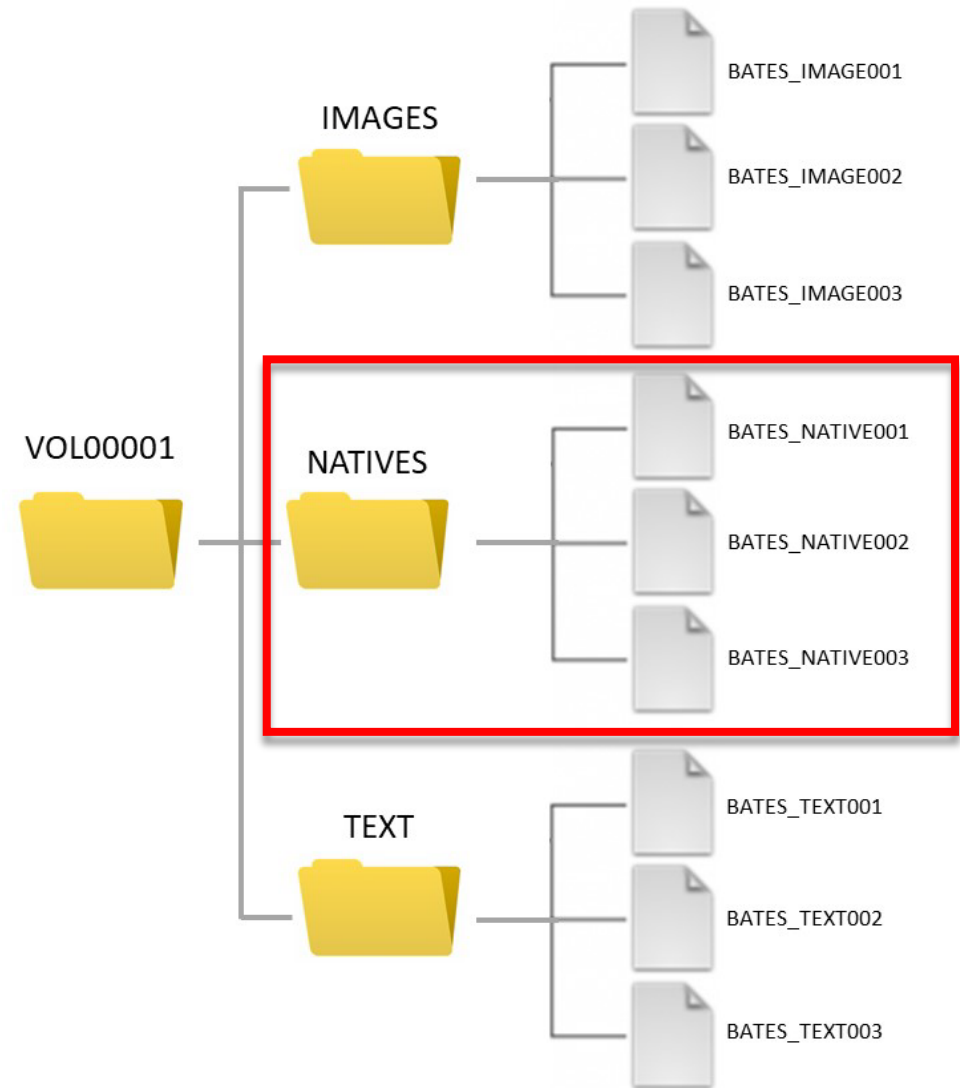
Original File Name

All project files are renamed according the bates prefix and numbering sequence. Native files would retain their file extensions.



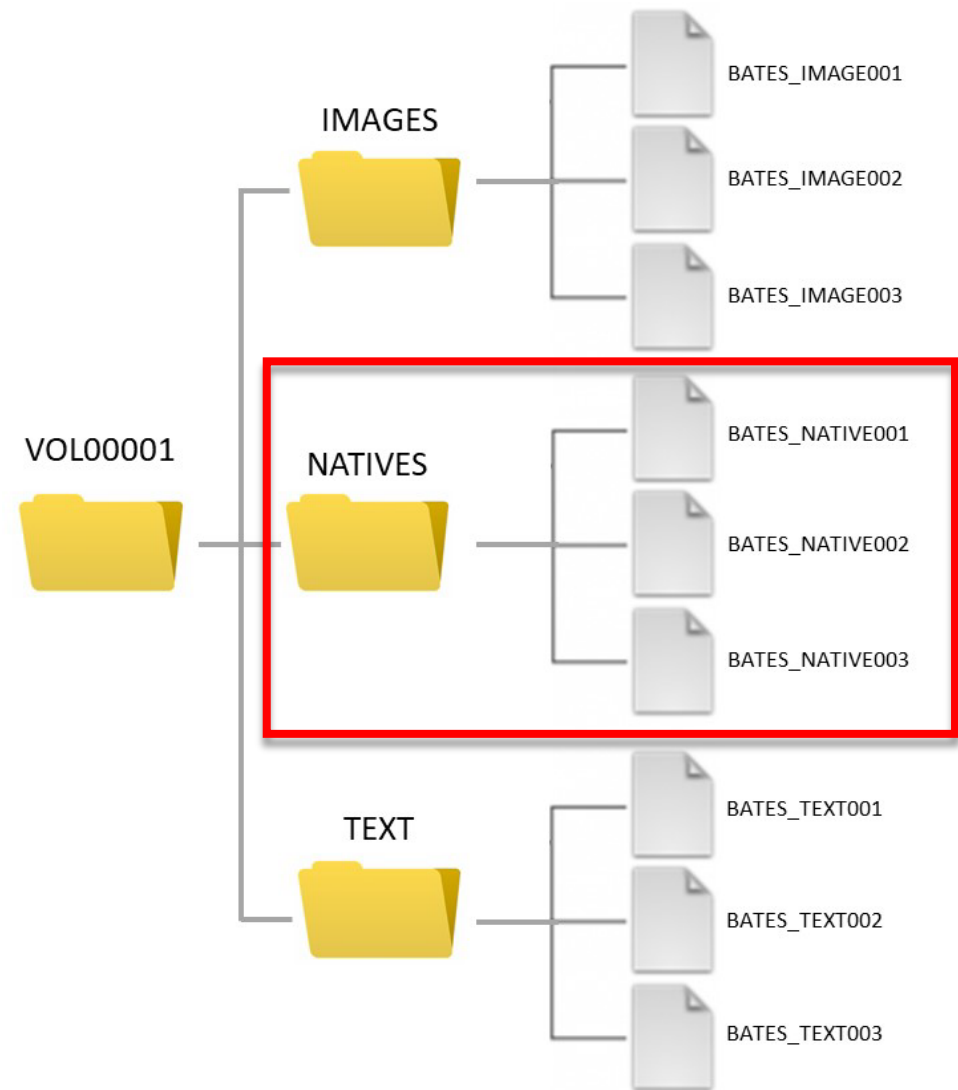
# ATSDR Water Model Project

- Both parties agree the ATSDR Water Model Project should be processed according to the agreed upon ESI protocol
- Both parties agree the ESI Process will preserve the native file formats (file extensions)
- Both parties agree the ESI process will rename all native files and group them under a common “Native” folder
- Both parties agree the native files after being renamed and moved will not retain any links or other file/project associations they may have had



# ATSDR Water Model Project

- The DOJ suggests that since the ESI process retains the native format all the plaintiffs' experts have to do is to access the new bates versions of each native file to do their analysis
- This is not accurate. Each native file is linked to the project file and other data files by name and location. Since the name and location have been changed those links are broken and would have to be relinked for the project be usable.
- This is not practical since the number of associations and links in projects of this type will range in the thousands to tens of thousands.





# Native Project Demonstration

Geographic Information Systems (GIS)

ArcGIS Pro quick-start tutorials

Learn the basics

Introducing ArcGIS Pro

Navigate maps and scenes

Create a project

Add data to a project

Explore data

Author a map

Visualize

Manage and edit data

Analyze

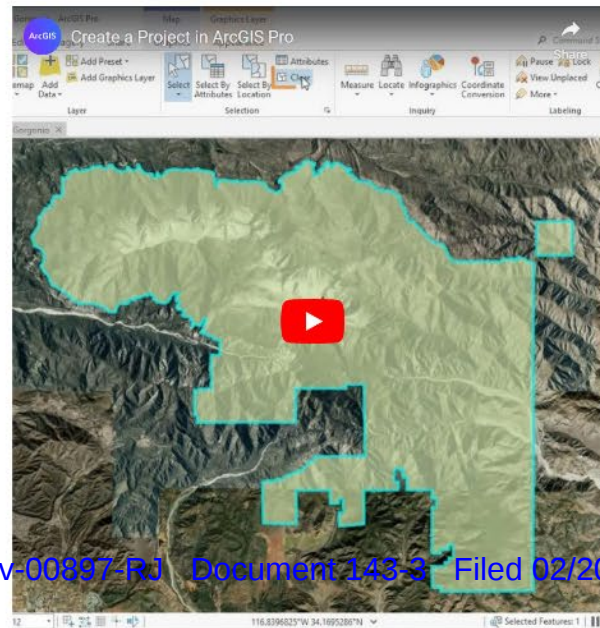
Share

## Create a project

ArcGIS Pro 3.2 | Other versions | Help archive

ArcGIS Pro helps you organize and manage the resources related to your work. To do this, it uses a project file (.aprx) as its default file type. An ArcGIS Pro project can contain maps, scenes, layouts, and other items. It can also contain connections to data stored in folders, databases, and servers. Maps, layers, and other GIS content can be added from portals such as your ArcGIS organization or ArcGIS Living Atlas of the World. Content you create in ArcGIS Pro can be shared to your portal.

### Overview

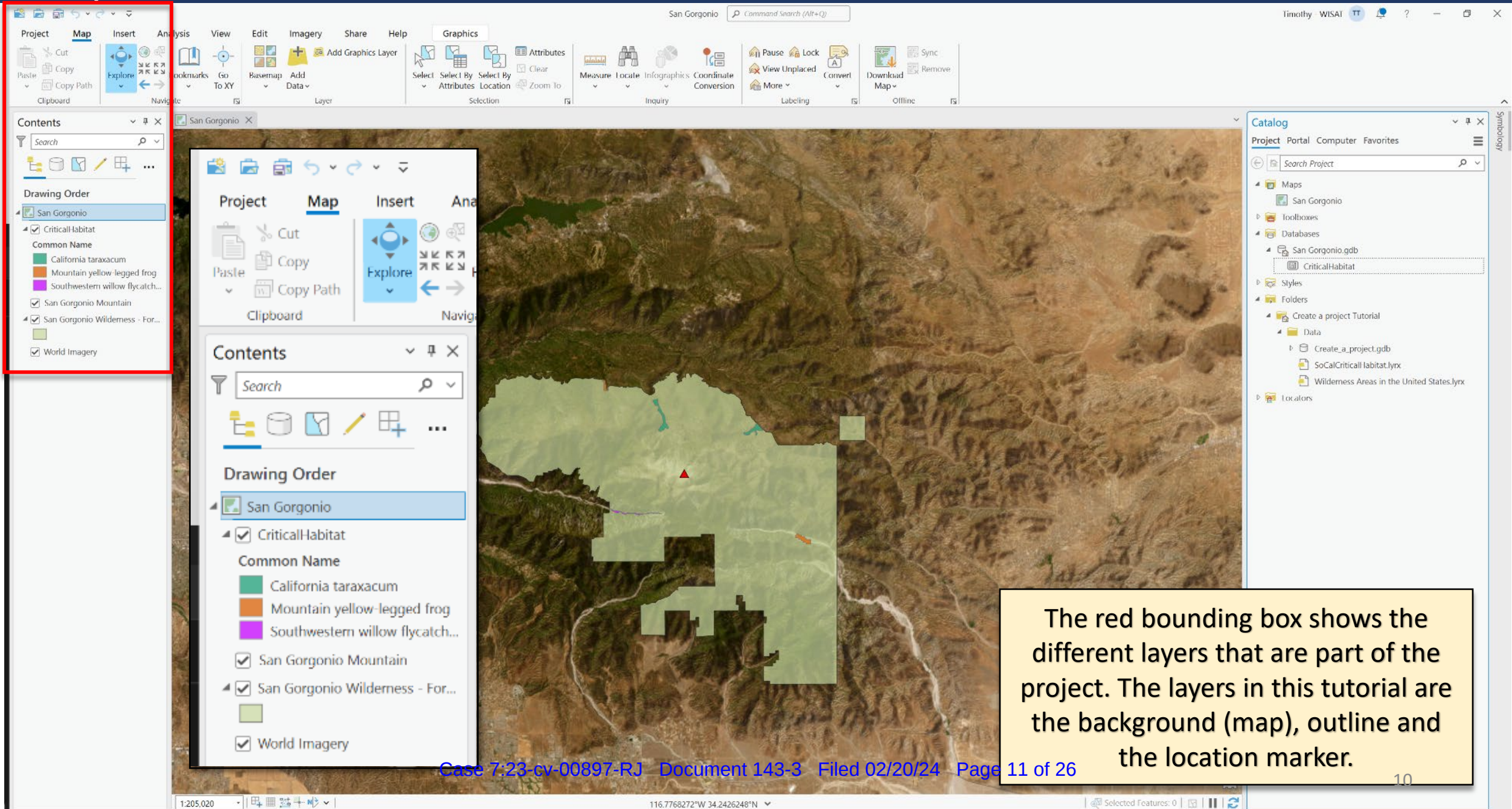


#### In this topic

- Overview
- Create a project from a default template
- Locate the study area
- Add wilderness data to the map
- Make a layer from a selected feature
- Add critical habitat data to the map
- Clip the critical habitat layer
- Symbolize the layer

Tutorial project was created to demonstrate importance of maintaining file names and locations in the ATSDR Water Modeling Project

# Completed Tutorial in ArcGIS





# Layer Data Sources

The screenshot displays the ArcGIS software interface. The main map area shows a satellite view of a landscape with a green area labeled 'CriticalHabitat'. The 'Layer Properties: CriticalHabitat' dialog box is open, showing the 'Data Source' tab. A red box highlights the 'Database' field, which contains the path 'C:\Create a project Tutorial\San Gorgonio.gdb'. A larger red box below the dialog box contains the text 'Database' and 'C:\Create a project Tutorial\San Gorgonio.gdb'. A yellow text box in the bottom right corner explains that the GIS software program creates a database where the data related to the layers are stored, and the stored data includes the file name and folder/path information.

San Gorgonio

Command Search (Alt+Q)

Timothy WISAI

Contents

San Gorgonio

CriticalHabitat

Common Name

- California taraxacum
- Mountain yellow legged frog
- Southwestern willow flycatch...

San Gorgonio Mountain

San Gorgonio Wilderness - For...

World Imagery

Layer Properties: CriticalHabitat

General

Metadata

Source

Elevation

Selection

Display

Cache

Definition Query

Time

Range

Data Source

Data type	File Geodatabase Feature Class
Database	C:\Create a project Tutorial\San Gorgonio.gdb
Name	CriticalHabitat
Alias	CriticalHabitat
ObjectID	32-bit
Feature Type	Simple
Geometry Type	Polygon
Coordinates have Z-value	No

Set Data Source...

Database

C:\Create a project Tutorial\San Gorgonio.gdb

Vertical Units

Meter

Extent

Spatial Reference

Domain, Resolution, and Tolerance

The GIS software program creates a database where the data related to the layers are stored. The stored data includes the file name and folder/path information.

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# Layer Data Sources

San Gorgonio

Command Search (Alt+Q)

Timothy WISAI

Project Map Insert Analysis View Edit Imagery Share Help Graphics Feature Layer Labeling Data

Cut Copy Paste Copy Path Clipboard

Explore Navigate Bookmarks Go to XY Basemap Add Data Layer

Select Select By Attributes Select By Location Clear Measure Locate Infographics Coordinate Conversion

Pause Lock View Unplaced More Labeling

Convert Download Map Sync Remove Offline

Contents

San Gorgonio

Drawing Order

San Gorgonio

CriticalHabitat

Common Name

- California taraxacum
- Mountain yellow legged frog
- Southwestern willow flycatcher...

San Gorgonio Mountain

San Gorgonio Wilderness - For...

World Imagery

Layer Properties: San Gorgonio Wilderness - Forest Service

General Metadata Source Elevation Selection Display Cache Definition Query Time

This layer comprises a subset of features. To access all features in the source data, clear the selection from the Selection tab.

Data Source

Data Type	File Geodatabase Feature Class
Database	C:\Create a project Tutorial\Data\Create_a_project.gdb
Name	National_Wilderness_Preservation_System
Alias	National_Wilderness_Preservation_System
ObjectID	32 bit

Set Data Source...

Database Database

C:\Create a project Tutorial\Data\Create\_a\_project.gdb

Compression Uncompressed

Split Model Update/Insert

Vertical Units Meter

Extent

Spatial Reference

OK Cancel

1:205,020

117.20/035.2°W 34.1532654°N

Selected Features: 0

Catalog

Project Portal Computer Favorites

Search Project

Maps

- San Gorgonio

Toolboxes

Databases

- San Gorgonio.gdb
  - CriticalHabitat

Styles

Folders

- Create a project Tutorial
  - Data
    - Create\_a\_project.gdb
    - SoCalCriticalHabitat.lyrx
    - Wilderness Areas in the United States.lyrx

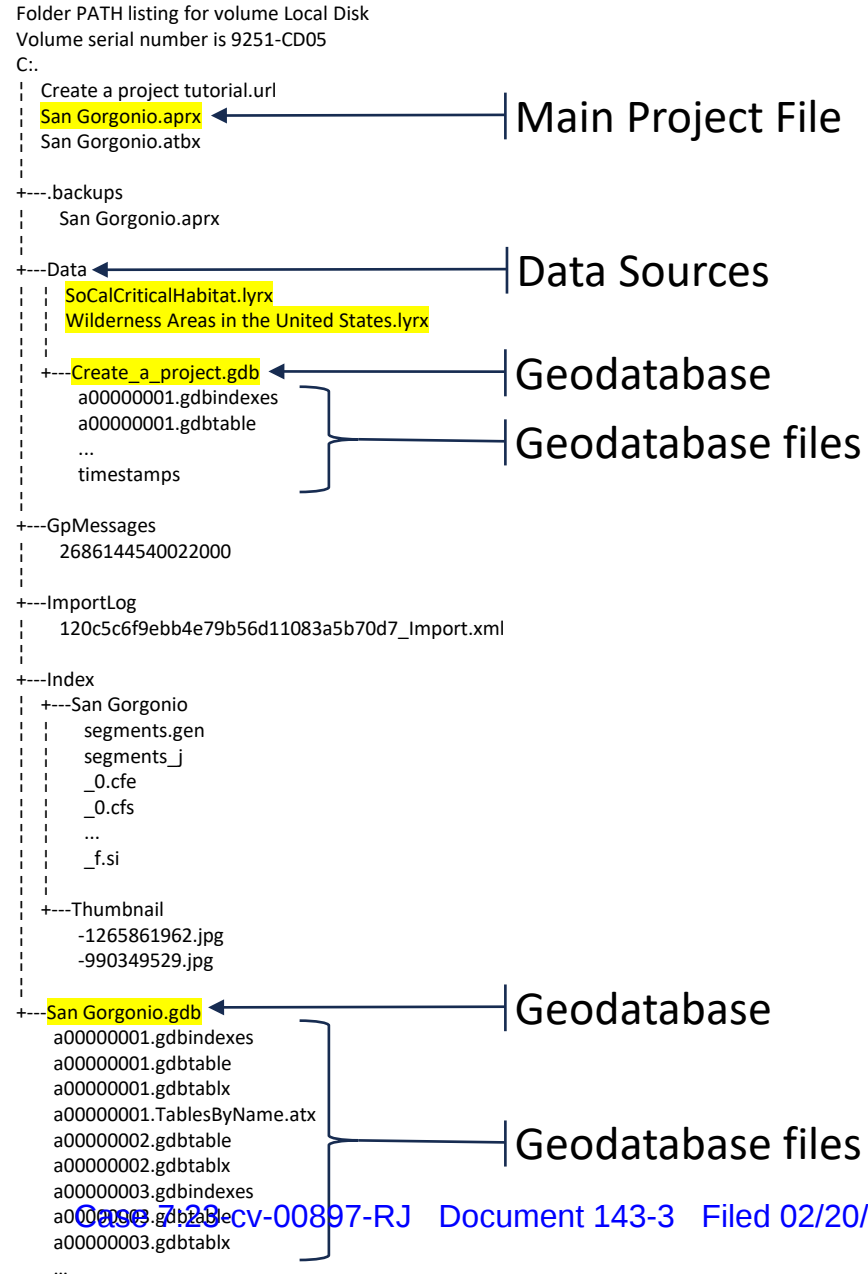
Locators

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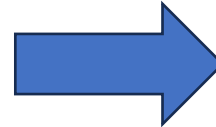
# Tutorial File Tree



This is the folder/file tree for the tutorial project showing the file locations (folders) and the numerous files created in this simple project.

# Project Files Renamed and File Structure Flattened (typical ESI production)

```
Folder PATH listing for volume Local Disk
Volume serial number is 9251-CD05
C:.
  Create a project tutorial.url
  San Gorgonio.aprx
  San Gorgonio.atbx
  +---backups
    San Gorgonio.aprx
  +---Data
    SoCalCriticalHabitat.lyrx
    Wilderness Areas in the United States.lyrx
    +---Create_a_project.gdb
      a00000001.gdbindexes
      a00000001.gdbtable
      ...
      timestamps
    +---GpMessages
      2686144540022000
    +---ImportLog
      120c5c6f9ebb4e79b56d11083a5b70d7_Import.xml
  +---Index
    +---San Gorgonio
      segments.gen
      segments_j
      _0.cfe
      _0.cfs
      ...
      _f.si
    +---Thumbnail
      -1265861962.jpg
      -990349529.jpg
  +---San Gorgonio.gdb
    a00000001.gdbindexes
    a00000001.gdbtable
    a00000001.gdbtablx
    a00000001.TablesByName.atx
    a00000002.gdbtable
    a00000002.gdbtablx
    a00000003.gdbindexes
    a00000003.gdbtable
    a00000003.gdbtablx
```



```
Folder PATH listing for volume Local Disk
Volume serial number is 9251-CD05
C:.
  bates_00000000.jpg
  bates_00000001.jpg
  bates_00000002.xml
  bates_00000003
  bates_00000004.gdbindexes
  bates_00000005.gdbtable
  bates_00000006.gdbtablx
  bates_00000007.gdbindexes
  bates_00000008.gdbtable
  bates_00000009.gdbtablx
  bates_00000010.atx
  bates_00000011.atx
  bates_00000012.gdbtable
  bates_00000013.gdbtablx
  bates_00000014.gdbtable
  bates_00000015.gdbtablx
  bates_00000016.gdbindexes
  bates_00000017.gdbtable
  bates_00000018.gdbtablx
  bates_00000019.gdbindexes
  bates_00000020.gdbtable
  bates_00000021.gdbtablx
  bates_00000022.freelist
  bates_00000023.gdbindexes
  bates_00000024.gdbtable
  bates_00000025.gdbtablx
  bates_00000026.horizon
  bates_00000027.spx
  bates_00000028.atx
  bates_00000029.atx
  bates_00000030.atx
  bates_00000031.atx
  bates_00000032
  bates_00000033
  bates_00000034
  bates_00000035
  bates_00000036
  bates_00000037
  bates_00000038
  bates_00000039
  bates_00000040
  bates_00000041
  bates_00000042
  bates_00000043
  bates_00000044.atx
  ...
```

The ESI creation process renames the files according a bates number and relocates the files to different folders.

# Before ESI Processing

The screenshot displays the ArcGIS Desktop interface for a project named "San Gorgonio". The main map area shows a satellite-style terrain view with a large, irregularly shaped area highlighted in light green. This highlighted area contains a red triangle marker and some blue lines representing water features. The interface includes a ribbon with toolbars for Project, Map, Insert, Analysis, View, Edit, Imagery, Share, Help, and Graphics. On the left, the Contents pane shows the project's drawing order, including "Critical habitat" with sub-categories for "California taraxacum", "Mountain yellow-legged frog", and "Southwestern willow flycatch...", as well as "San Gorgonio Mountain" and "San Gorgonio Wilderness - For...". On the right, the Catalog pane shows the project's structure, including "San Gorgonio.gdb" and "CriticalHabitat".

**If the pre-ESI project is compared to the Post-ESI it is clear that the ESI process file name and location changes will cause the project to have numerous errors.**

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1:205,020 | 116.7768272°W 34.2426248°N | Selected Features: 0



# After ESI Processing: Missing Layers

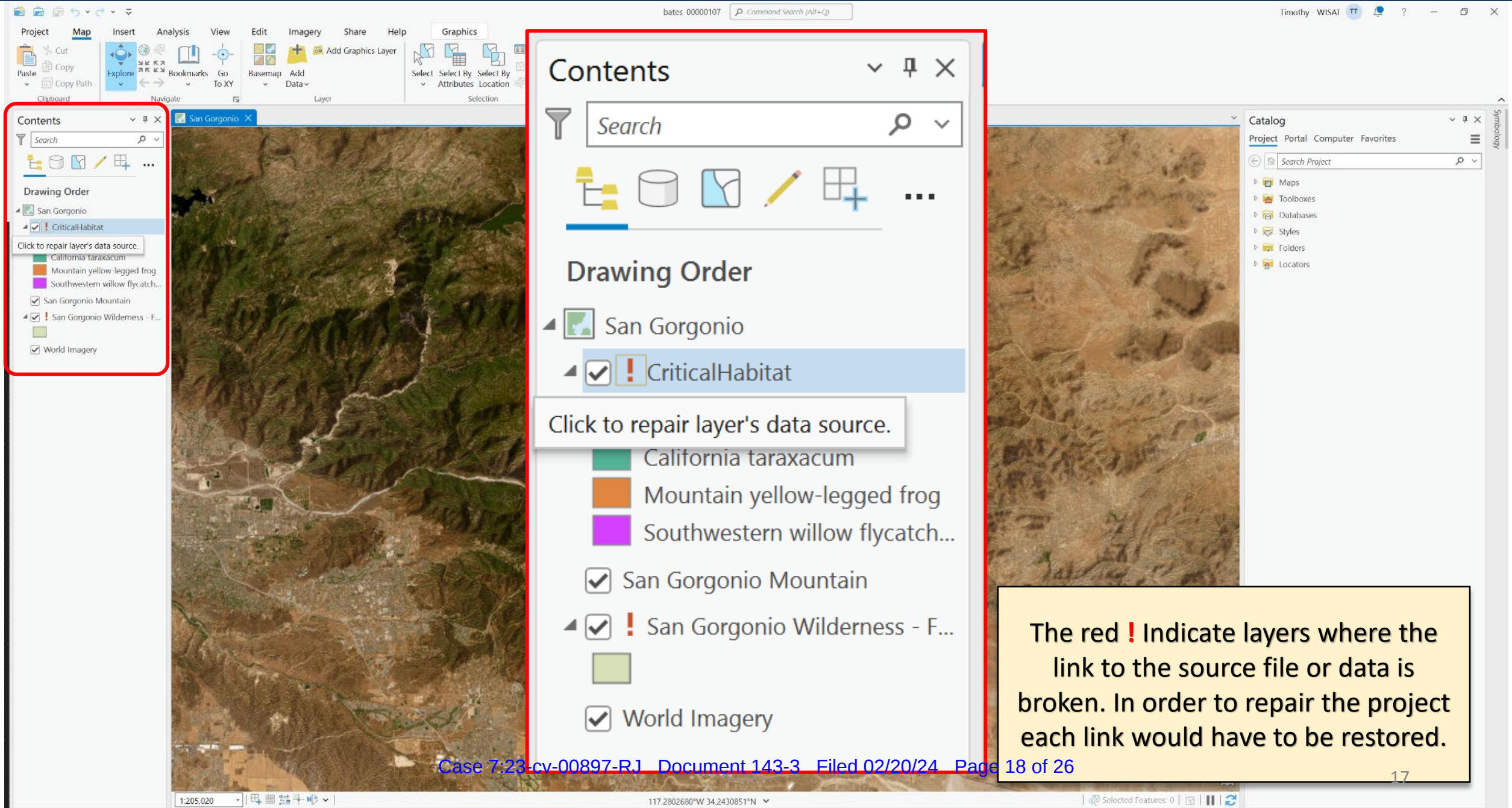
The screenshot displays the ArcGIS interface with the following elements:

- Contents Panel (Left):** A red box highlights this panel. It shows a search bar, drawing order icons, and a list of layers for the project "San Geronio". The layers are:
  - San Geronio
  - Critical-Habitat (checked)
  - California taraxacum (with a broken link icon)
  - Mountain yellow-legged frog (with a broken link icon)
  - Southwestern willow flycatch... (with a broken link icon)
  - San Geronio Mountain (checked)
  - San Geronio Wilderness - F... (checked)
  - World Imagery (checked)
- Map View (Center):** A satellite-style map of a mountainous region. A red triangle marker is placed on a peak.
- Catalog Panel (Right):** Shows a project catalog with folders for Maps, Toolboxes, Databases, Styles, Folders, and Locators.
- Toolbar (Top):** Includes Project, Map, Insert, Analysis, View, Edit, Imagery, Share, and Help menus.
- Status Bar (Bottom):** Shows coordinates (117.2802680°W 34.2430851°N) and a scale of 1:205,020.

**Broken links will be created when the project file names and locations are changed which will be flagged when trying to open the project.**



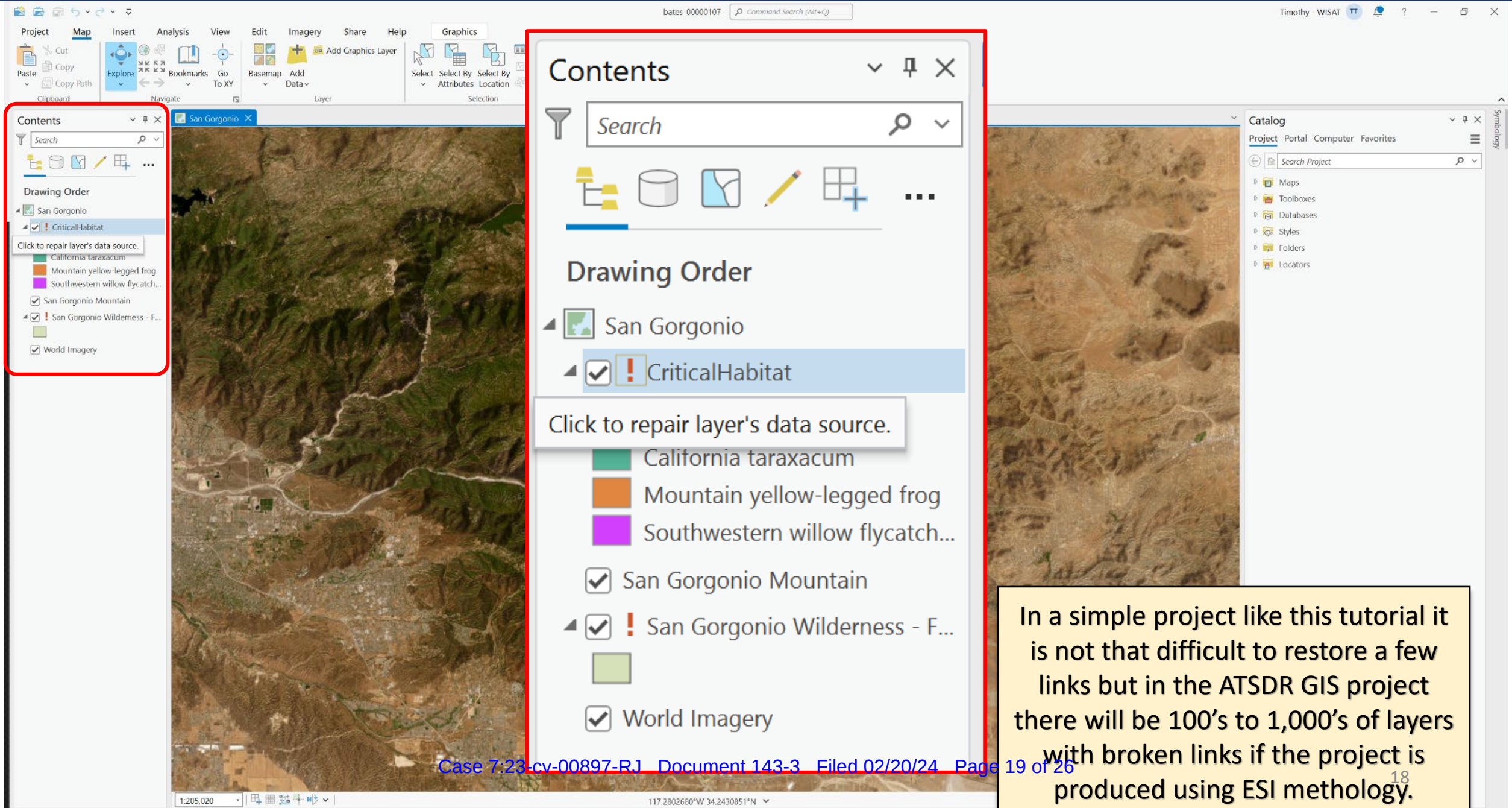
# After ESI Processing: Missing Layers



The red ! Indicate layers where the link to the source file or data is broken. In order to repair the project each link would have to be restored.



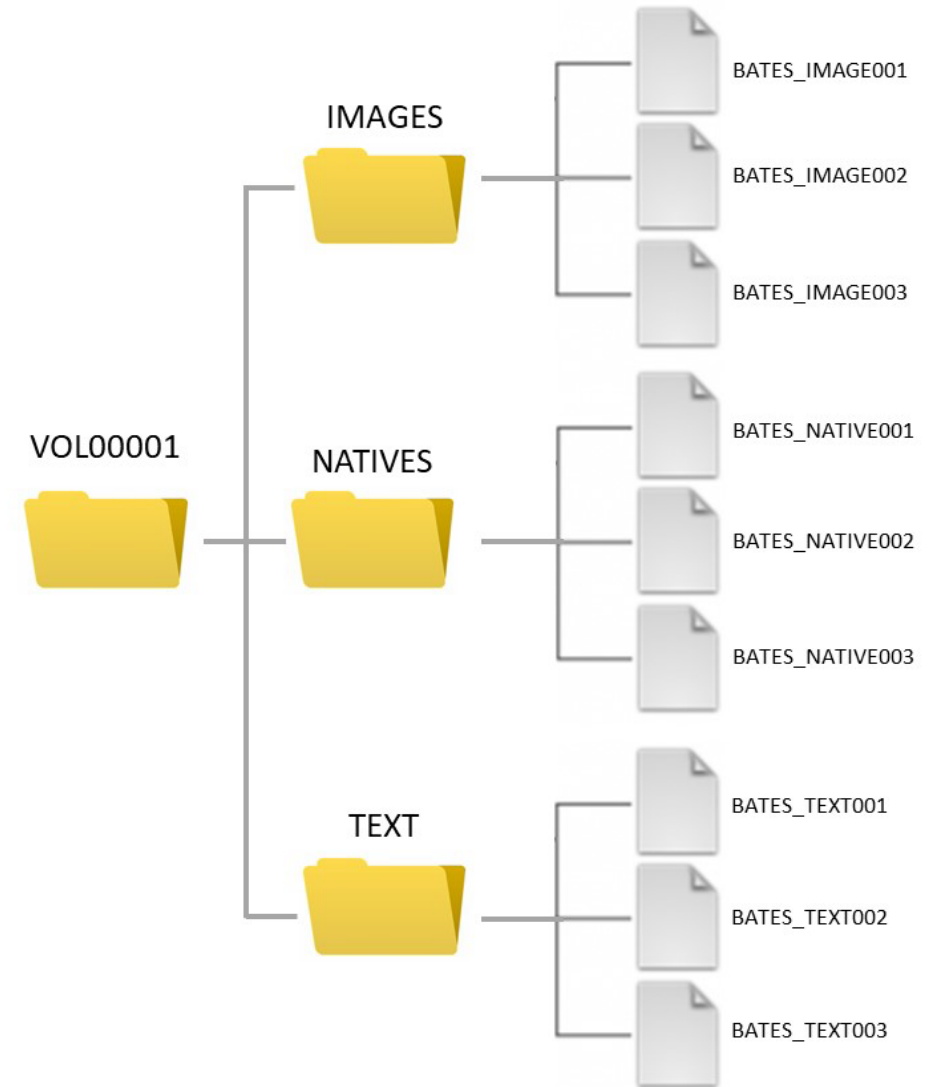
# After ESI Processing: Missing Layers



In a simple project like this tutorial it is not that difficult to restore a few links but in the ATSDR GIS project there will be 100's to 1,000's of layers with broken links if the project is produced using ESI methology.

# ATSDR Water Model Project

- To rectify this the DOJ wants to provide a “map” of the original folder-subfolder-file structure to allow the plaintiffs to recreate the ARSDR Water Model Project
- The “map” is a listing of the original folder paths and file locations from the ATSDR water Model Project. A sample of which is shown below:



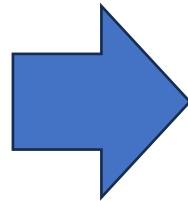
#TYPE Selected.System.IO.DirectoryInfo	FullName
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM	E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC	E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion	E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\Camp Lejeune SVI_20170717.docx	E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\Camp Lejeune SVI_20170717.docx
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA Fig13-14.pdf	E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA Fig13-14.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA16.pdf	E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA16.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA17.pdf	E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA17.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA4.1_TCE HPIA layer1.pdf	E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA4.1_TCE HPIA layer1.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA5.1_benzene HPIA layer1.pdf	E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA5.1_benzene HPIA layer1.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA6.1_TCE HP landfill layer1.pdf	E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA6.1_TCE HP landfill layer1.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA6.4_PCE HP landfill layer1.pdf	E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA6.4_PCE HP landfill layer1.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA Sup3 FigS3.21_Pot surface.pdf	E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA Sup3 FigS3.21_Pot surface.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA TabA7-8_pot&doc sources.pdf	E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA TabA7-8_pot&doc sources.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChD FigD7-8_Bldg645 benzene USTP.pdf	E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChD FigD7-8_Bldg645 benzene USTP.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\DZL4_DRAFT_Camp Lejeune VI Work Plan_modeling and	E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\DZL4_DRAFT_Camp Lejeune VI Work Plan_modeling and
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\DZL4_DRAFT_Camp Lejeune VI Work Plan_modeling and	E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\DZL4_DRAFT_Camp Lejeune VI Work Plan_modeling and
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\table1_ResultsSummary (002).docx	E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\table1_ResultsSummary (002).docx

# ATSDR Water Model Project

- To accomplish this the plaintiffs would have to first rename all the bates files back to their original file names using a batch rename process

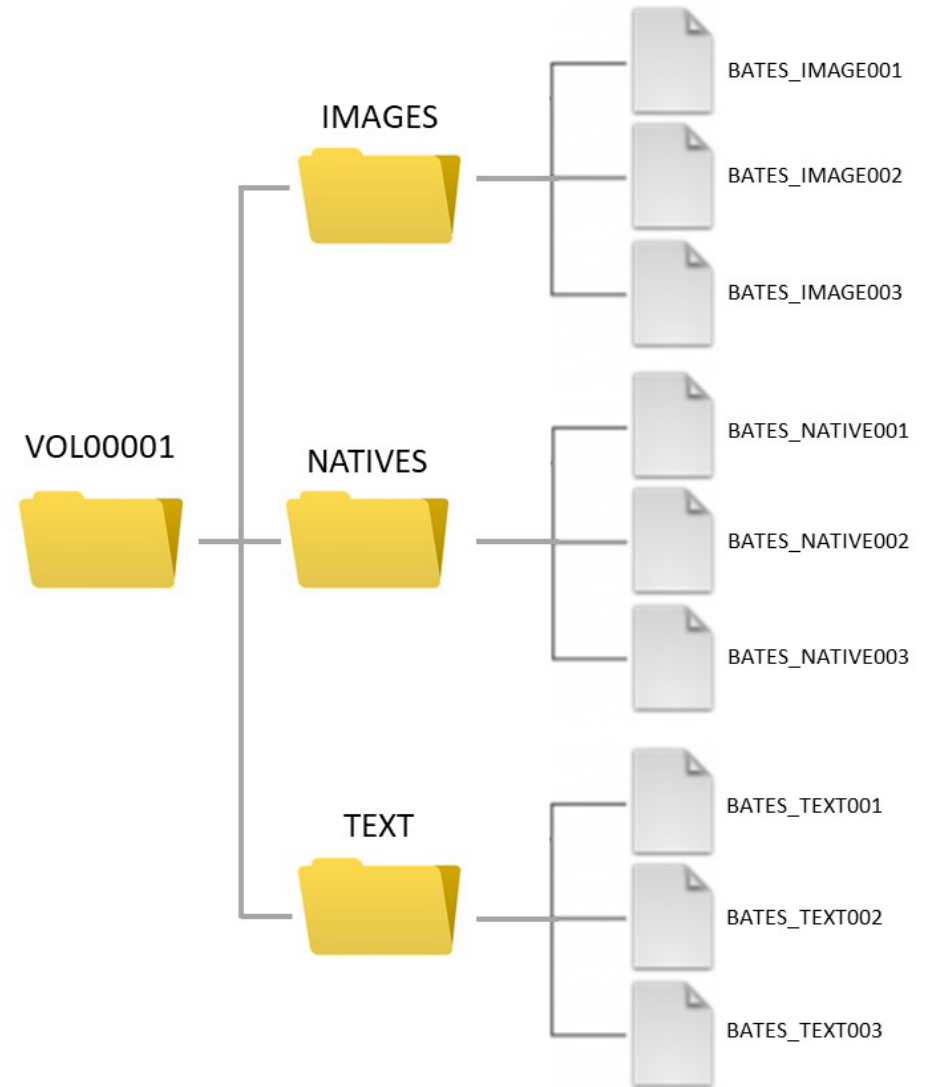
BEGDOC#
CLJA_WATERMODELING-0000000001
CLJA_WATERMODELING-0000000002
CLJA_WATERMODELING-0000000003
CLJA_WATERMODELING-0000000004
CLJA_WATERMODELING-0000000005
CLJA_WATERMODELING-0000000006
CLJA_WATERMODELING-0000000008
CLJA_WATERMODELING-0000000010
CLJA_WATERMODELING-0000000011
CLJA_WATERMODELING-0000000012
CLJA_WATERMODELING-0000000013

Bates File Name



FILENAME
ChA FigA4.1_TCE HPIA layer1.pdf
Table1_ResultsSummary (002).docx
ChA FigA16.pdf
ChA FigA17.pdf
ChA FigA6.1_TCE HP landfill layer1.pdf
ChD FigD7-8_Bldg645 benzene USTP.pdf
ChA Fig13-14.pdf
ChA FigA5.1_benzene HPIA layer1.pdf
Camp Lejeune SVI_20170717.docx
ChA Sup3 FigS3.21_Pot surface.pdf
ChA FigA6.4_PCE HP landfill layer1.pdf

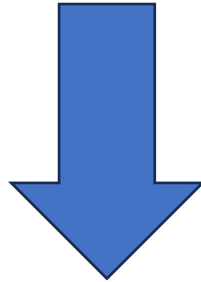
Original File Name



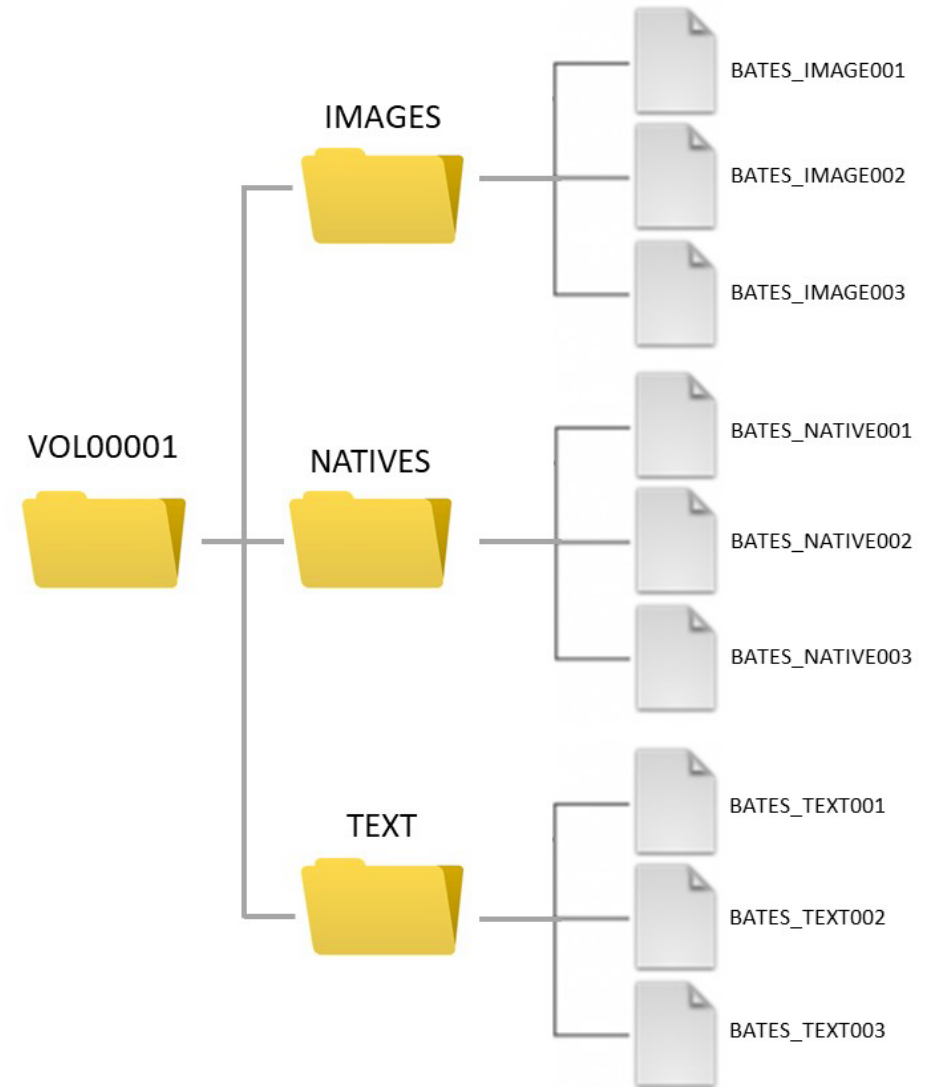
# ATSDR Water Model Project

- The next step would be to recreate to folder-subfolder structure of the ATSDR Water Model Project

E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC\Soil Vapor Intrusion



Hundreds to thousands of additional folders-subfolders would have to be recreated through a batch process



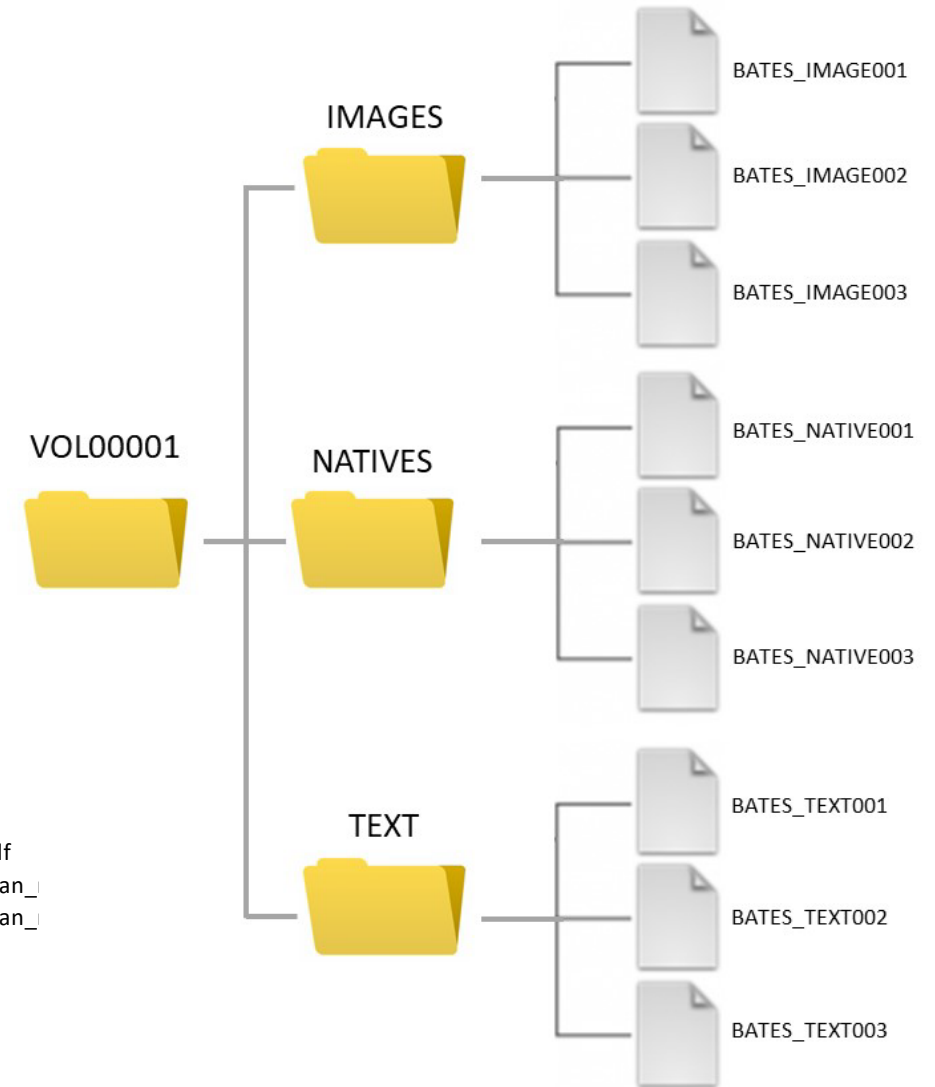


# ATSDR Water Model Project

- Once the original folder-subfolder structure has been recreated the renamed files would have to be moved to their original location through a batch process

E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC\Soil Vapor Intrusion  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC\Soil Vapor Intrusion\Camp Lejeune SVI\_20170717.docx  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA Fig13-14.pdf  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA16.pdf  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA17.pdf  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA4.1\_TCE HPIA layer1.pdf  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA5.1\_benzene HPIA layer1.pdf  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA6.1\_TCE HP landfill layer1.pdf  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA6.4\_PCE HP landfill layer1.pdf  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA Sup3 FigS3.21\_Pot surface.pdf  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA TabA7-8\_pot&doc sources.pdf  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChD FigD7-8\_Bldg645 benzene USTP.pdf  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC\Soil Vapor Intrusion\DZL4\_DRAFT\_Camp Lejeune VI Work Plan\_  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC\Soil Vapor Intrusion\DZL4\_DRAFT\_Camp Lejeune VI Work Plan\_  
E:\2023-014\_DOJ\EDRP\CCEHIP\_ATSDR\_EDRP02\Site\_Files\_MLM\Camp Lejeune NC\Soil Vapor Intrusion\Table1\_ResultsSummary (002).docx

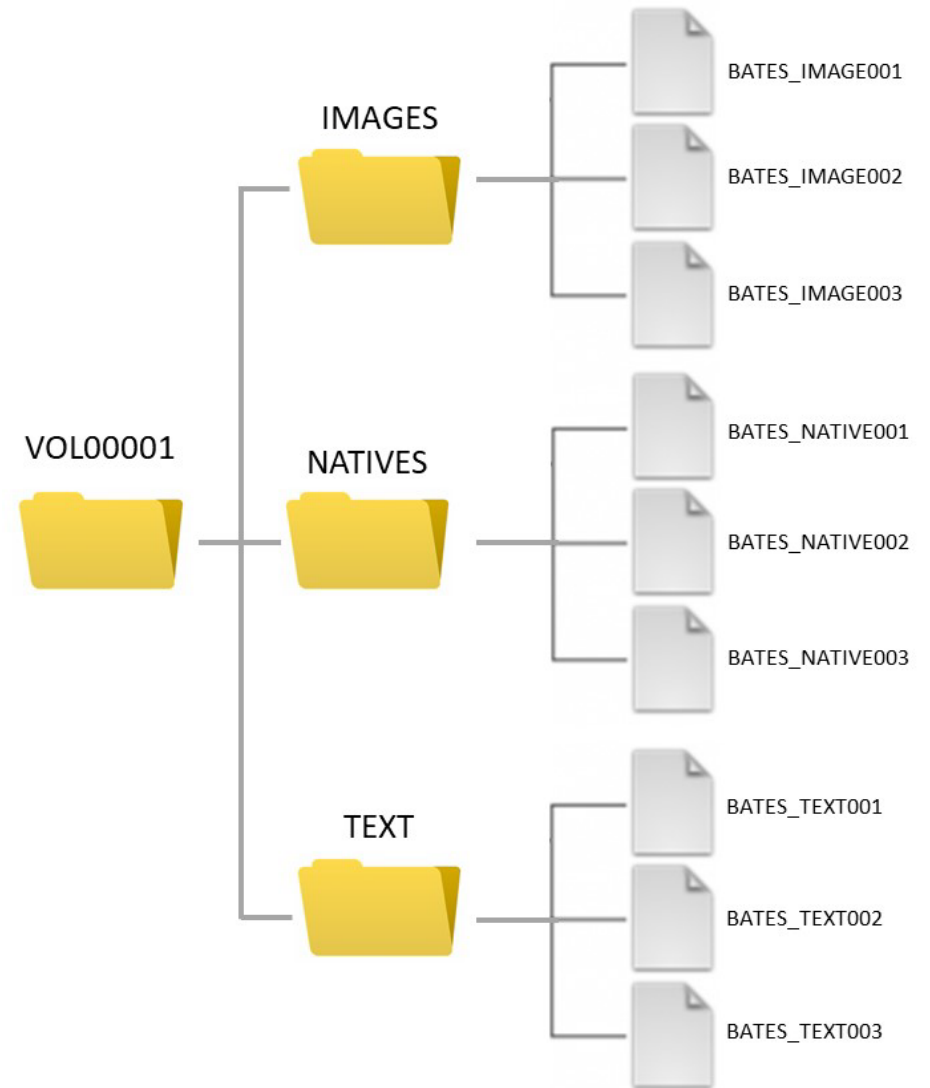
- The project would then have to be tested to verify all native files have been restored





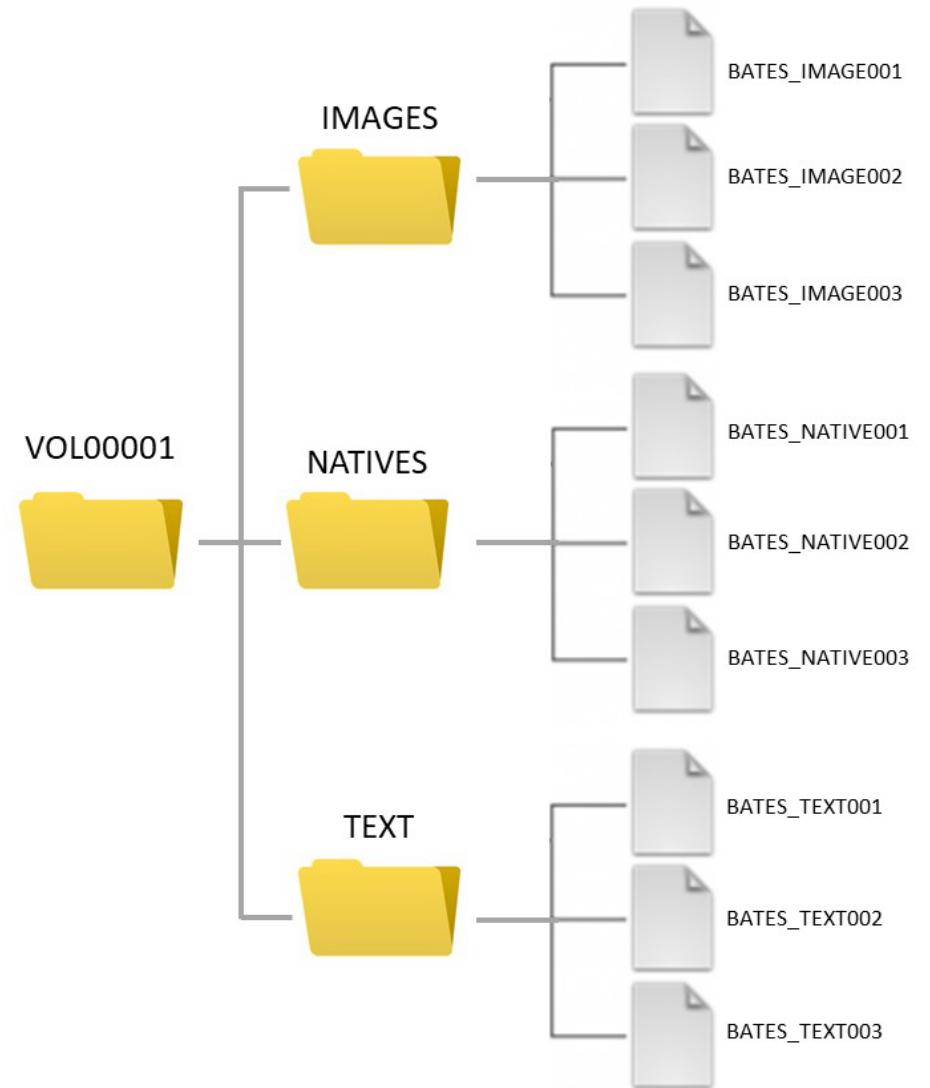
# ATSDR Water Model Project

- The plaintiffs are requesting the DOJ to simply clone the ATSDR Water Model Project onto a suitable hard drive and provide that instead of requiring the rebuilding of the entire project through the steps previously outlined.
- The end result is the same: The plaintiffs have a functioning copy of the project and can move forward in their evaluation of the material.
- The difference is that the unnecessary step of having to rebuild the project is eliminated which saves time, reduces cost and eliminates the chance of errors being introduced during the tear down – rebuild process.

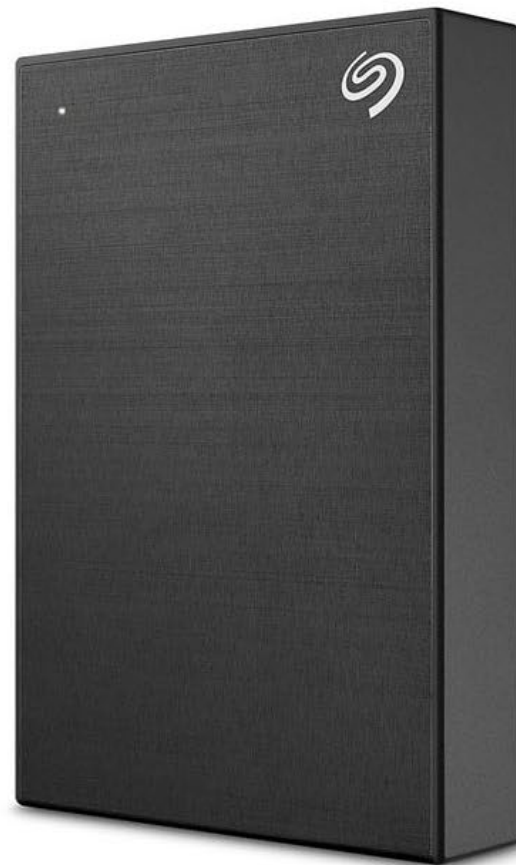


# ATSDR Water Model Project

- When asked why they can't clone the project the DOJ raises the issue that if the plaintiffs' experts use the files in the original native format that it will create confusion in a deposition or other similar circumstance.
- But contrary to this they offer the plaintiffs the ability to recreate the original project using their supplied "map" which is the same thing as providing plaintiffs a clone of the project.
- The DOJ fails to acknowledge that the ESI bates version of the project allows both parties to cross reference original file names to the corresponding bates file version.



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