

EXHIBIT D

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

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DANIEL MCTIERNAN, : No. 7:23-cv-00535-BO
Plaintiff :
v. :
UNITED STATES OF :
AMERICA, :
Defendant :

- - -

JANUARY 25, 2024

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Videotape Deposition of
DANIEL MCTIERNAN, taken pursuant to
notice, was held at Peter Rodino Federal
Building, 970 Broad Street, Suite 700,
Newark, New Jersey 07102, commencing at
10:26 a.m., on the above date, before
Amanda Dee Maslynsky-Miller, a Court
Reporter and Certified Realtime Reporter.

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ALSO PRESENT:

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Daniel Ortega, Videographer

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1 But I wanted to just sort of
2 walk through your -- your DPP form here.

3 So Question 43 states, What
4 diseases or injuries does the claimant
5 assert are related to exposure to water
6 at Camp Lejeune?

7 Do you -- do you see that?

8 A. Yes.

9 Q. And you've checked, Bladder
10 cancer?

11 A. Yes.

12 Q. Okay. And then, Other, you
13 have there, Atrial fibrillation.

14 Do you see that?

15 A. Yes.

16 Q. Okay. Hyperthyroidism.

17 A. Yes.

18 Q. Do you see that?

19 Non-toxic nodular goiter.

20 Do you see that?

21 A. Yes.

22 Q. Hepatic cysts?

23 A. Yes.

24 Q. Diverticulitis?

1 A. Diverticulitis?

2 Q. Yeah. Or losis?

3 ATTORNEY MANDELL: Losis.

4 BY ATTORNEY ANWAR:

5 Q. Yeah.

6 Do you see that?

7 A. Yes.

8 Q. And dental issues.

9 A. Yes.

10 Q. Do you see that?

11 Just based on your DPP, are
12 these -- these are all -- are these all
13 conditions you're claiming were caused by
14 water at Camp Lejeune?

15 ATTORNEY MANDELL: I would
16 just object and say don't mention
17 conversations that you've had with
18 your attorneys.

19 But if you can answer it,
20 please go ahead and answer it.

21 THE WITNESS: Yes, these are
22 all --

23 ATTORNEY MANDELL: Outside
24 of that.

1 THE WITNESS: -- all ones
2 that I've identified as possibly
3 or probably, not being able to
4 come up with any other activity
5 that's taken place, and looking at
6 my family history, my siblings,
7 we've all grown up and worked
8 somewhat the same, I'm the only
9 one with these issues. No one
10 else has them.

11 The only constant that I can
12 see coming in here that would
13 cause those would be Camp Lejeune
14 water -- well, not Camp Lejeune
15 water, the poisoning effects of
16 Camp Lejeune water.

17 BY ATTORNEY ANWAR:

18 Q. Okay. Got it.

19 Are there any other health
20 issues that you've experienced that you
21 have identified or believe are the result
22 of Camp Lejeune water?

23 ATTORNEY MANDELL: And,
24 again, just no communications with