

# Exhibit 2



**U.S. Department of Justice**  
Civil Division, Torts Branch  
Environmental Torts

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Sara J. Mirsky  
Email: sara.j.mirsky@usdoj.gov

**VIA EMAIL AND FEDEX**

April 11, 2024

Lead Counsel for Plaintiffs  
& Co-Lead Counsel for Plaintiffs

**Re: *Camp Lejeune Water Litigation – United States’ Production of Documents***

Counsel:

In accordance with the Court’s March 12, 2024, Order and in compliance with the ESI Protocol (CMO No. 8), enclosed via FedEx is a hard drive containing a native production of the “exotic” ATSDR water modeling project files.

In the interest of transparency, we are also producing via email a spreadsheet named “WaterModeling\_OriginalData\_CrossReference.” This spreadsheet is an index of the native files contained on the hard drive and matches each file to the corresponding DOCID in the previous, load-ready productions. For each file, the index contains the file path, the original production number, the Relativity file path, the file extension, the file name, and the Relativity DOCID. We are producing this index solely for your convenience.

The United States believes in good faith that this production contains all the “exotic” files within the water modeling project files that are required to be produced natively pursuant to the Court’s Order. Of course, should Plaintiffs identify, with specificity, additional technical data required in native format, the United States will consider such requests as contemplated both by the Court’s Order and the ESI Protocol.

As previously relayed, this and all other water modeling project file productions are being designated as confidential and produced under the strongest protections possible under the Protective Order. These protections are especially crucial here, where the data is being produced natively and without any confidentiality endorsement. Confidentiality is particularly important for any data or information related to well locations or other water sources, which implicate national security concerns. The United States expects that Plaintiffs will not permit the release of any of these materials to non-parties, and that those individuals to whom Plaintiffs provide this information will understand the confidential nature of these documents and sign the Protective Order before viewing any of the produced materials. The United States will seek immediate Court intervention should any inappropriate release of project file materials occur.

The United States is also maintaining all possible privileges over the documents that will be produced as part of the project files, and reserves its right to clawback any documents following production. Plaintiffs will also be expected to conform to their obligations under CMO No. 5 for

all project file documents, including notifying the United States immediately upon the identification of any privileged document.

Please let us know if you have any questions or would like to discuss further.

Best Regards,

/s/ Sara J. Mirsky

Sara J. Mirsky

Trial Attorney

U.S. Department of Justice

Civil Division, Torts Branch

Enclosures: As Stated

cc: Counsel of Record in *Camp Lejeune Water Litigation*