

CAMP LEJEUNE PLAINTIFFS' LEADERSHIP COUNSEL

REPORT ON THE STATUS OF THE CAMP LEJEUNE WATER LITIGATION
JUNE 13, 2024

Dear Counsel and *Pro Se* Plaintiffs:

The Court conducted a status conference on Wednesday, June 12, 2024, attended by Plaintiffs' Leadership Group and DOJ counsel. The Honorable Magistrate Judge Robert Jones presided. The Court heard updates from the parties regarding several matters, including:

1. Motions/Matters Pending and Ripe for Determination

- Plaintiffs' Leadership Group's Motion for Rule 16 Conference.
- Plaintiffs' Leadership Group's Motion for Partial Summary Judgment of Plaintiffs James Key, II, Carol Bassano, Eddie Mae Miller, and Rachel Armstrong on CLJA Legal Representative Procedure.
- Discovery Order for Track 2 Illnesses.
- Selection of Track 3 Illnesses.
 - DOJ proposes: Miscarriage, dental defects, hypersensitivity skin disorder, medical monitoring, esophageal cancer.
 - Plaintiffs' Leadership Group proposes: Pancreatic cancer, esophageal cancer, scleroderma, multiple myeloma, and aplastic anemia.
- Several motions have been withdrawn as a result of the parties agreeing to resolve issues in dispute (Plaintiffs' Leadership Group's Motion Regarding Water Modeling [D.E. 194]; Plaintiffs' Leadership Group's Motion Regarding Muster Rolls [D.E. 192]; Plaintiffs' Leadership Group Motion to Compel and DOJ's Motion for Protective Order in response [D.E. 81; D.E. 93].

2. Stipulations

The parties reported that they are working diligently to finalize the stipulations. The parties report that they will have a set of global stipulations for the Court's consideration for filing in the Master Docket. It is anticipated that these stipulations will be incorporated in the pretrial orders for the individual Track 1 trial cases. Thereafter, the parties hope to reach an agreement on more stipulations which will be specifically related to each individual Trial Plaintiff.

3. Settlement Master

The Court announced that it soon will be conducting interviews of potential Special/Settlement Masters for appointment.

4. Other Issues

The Court requested a forecast of what will be transpiring over the next 90 days. The parties indicated that the process for selecting the first 25 Track 1 Plaintiffs for trial will be completed within the next two weeks. All remaining Track 1 Plaintiffs' cases will be stayed pending the trials of the first 25 Track 1 Plaintiffs. Once selection is finalized, the parties will then have 45 days within which to complete fact discovery. There remain a few depositions of fact witnesses and

treating physicians that need to be completed. There is also some outstanding written discovery, mostly related to damages, that needs to be completed. Thereafter, the parties will engage in expert witness discovery and thereafter proceed to trials.

The next status conference with the Honorable Magistrate Judge Robert Jones has been scheduled for Thursday, June 27, 2024, at 11:00 a.m. in Wilmington.

The transcript of the June 12 status conference will be posted by Plaintiffs' Leadership Group on its website upon receipt of same.

Note that with respect to administrative claims, the DOJ takes the position that all administrative claim forms must be presented to the Department of Navy by **August 10, 2024**. The Department of Navy has indicated that the following five fields must be completed in order for the administrative claim to be properly presented: Name, Injury, Sum Certain, Authority, and Signature. See the FAQs released by the Department of Navy on our website.

Please continue to monitor our website for real-time updates: <https://camplejeunecourtinfo.com/>.

Respectfully
Plaintiffs' Leadership,

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ND:4873-3046-1639, v. 1