

CAMP LEJEUNE PLAINTIFFS' LEADERSHIP COUNSEL

REPORT ON THE STATUS OF THE CAMP LEJEUNE WATER LITIGATION
SEPTEMBER 25, 2024

Dear Counsel and *Pro Se* Plaintiffs:

The Court conducted a status hearing on Tuesday, September 24, 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 Before the Court

- Plaintiffs' Leadership Group's Motion for Rule 16 Conference. [D.E. 155]
- The Parties' Respective Proposed Discovery Plans for Track 2 Illnesses. [D.E. 155 & 156]

2. Discovery Issues

- Fact discovery is close to completion. Plaintiffs' Leadership Group will be taking the depositions of the ATSDR's water modeler on September 26, 2024, and of Dr. Frank Bove with the ATSDR in mid-October. Plaintiffs' Leadership Group will also be conducting a document inspection on September 30, 2024, and taking the deposition of the Project Director for the National Academy of Sciences' 2009 Report by the end of October.

3. General Framework for Trial

- The parties reported that they are close to an agreement regarding the nature of proof and trial framework for Phase 1 – the water modeling phase. The parties anticipate submitting a joint proposal for Phase 1 soon.
- With respect to Phase 2 – the general causation phase, the parties reported they are continuing to work on an agreement, and if agreement can be reached, they will be submitting a joint proposal. If the parties are unable to reach an agreement on the nature and trial framework for Phase 2, they will submit competing proposals for the Court's consideration.

4. Other Issues

- With respect to the Document Depository in Raleigh, which has been created by Plaintiffs' Leadership Group, DOJ will be inspecting the documents and tangible items in the Depository on October 3, 2024.
- With respect to expert discovery issues, the parties have agreed on what constitutes an expert reliance file and will be submitting a joint proposal for the Court's consideration.
- With respect to Stipulations, the parties continue to confer but hope to present stipulations pertinent to Phase 1 (water modeling) soon.

The transcript of the September 24, 2024, hearing will be posted by Plaintiffs' Leadership Group on its website upon receipt of same.

The next status conference with the Honorable Magistrate Judge Robert Jones has been scheduled for Tuesday, October 22, 2024, at 11:00 a.m. in Wilmington.

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

Respectfully
Plaintiffs' Leadership,

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