

CAMP LEJEUNE PLAINTIFFS' LEADERSHIP COUNSEL

REPORT ON THE STATUS OF THE CAMP LEJEUNE WATER LITIGATION
NOVEMBER 21, 2024

Dear Counsel and *Pro Se* Plaintiffs:

The Court conducted a status hearing on Wednesday, November 20, 2024, attended by Plaintiffs' Leadership Group ("PLG") and DOJ counsel. The Honorable Magistrate Judge Robert Jones presided. The Court heard updates from the parties regarding several matters, including:

1. Motions Requiring Rulings From The Court

- Bellwether Plaintiff Edward Raymond's Motion for Relief from Bellwether Plaintiff Service and Motion for Expedited Briefing. PLG has submitted the Motion and Brief in support of same and has requested an expedited response from DOJ within seven days. DOJ requested fourteen days to respond. The Court determined DOJ's responsive Brief is due November 27. DOJ represented that its Brief will contain certain alternative proposals for resolution, and the parties will work to resolve this issue, subject to the Court's approval.
- PLG's request for a Rule 16 conference (D.E. 155).
- The Parties' respective proposed discovery plans for Track 2 illnesses (D.E. 155, 156).

2. Stipulations

- Reliance Files: The parties are close to reaching an agreement and will be submitting a joint proposal regarding the definition of "reliance files."
- Phase II Proof Language: The parties are continuing to work on a proposed stipulation for the general framework for trial for Phase 2. The parties hope to submit a proposed stipulation soon. The parties do not feel court involvement will be needed.
- Phase I: The DOJ's expert disclosures for Phase I are due on December 9. After those disclosures are made it is likely stipulations can be exchanged regarding Phase I.

3. Discovery Issues

- The parties reported that fact discovery is almost complete. DOJ is conducting some supplemental discovery related to damages as well as a new diagnosis of bladder cancer for a Track 1 Leukemia Trial Plaintiff.
- PLG provided notice of lifecare planner examinations for six Trial Plaintiffs. DOJ's lifecare planner will conduct examinations of these six Trial Plaintiffs and are working with PLG to coordinate those examinations.

4. Reassignment of Track 1 Cases

The Court reported that the cases are currently being reassigned to specific judges for conducting Track 1 trials. The case reassignments will be forthcoming.

The transcript of the November 20, 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, December 17, 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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