

CAMP LEJEUNE PLAINTIFFS' LEADERSHIP COUNSEL

REPORT ON THE STATUS OF THE CAMP LEJEUNE WATER LITIGATION
JANUARY 13, 2025

Dear Counsel and *Pro Se* Plaintiffs:

The Court conducted a status hearing on Monday, January 13, 2025, 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. Update on Expert Discovery

- The parties indicate that they are continuing to work on expert witness designations and discovery, in conformity with the deadlines.
- One of PLG's water modeling expert reports was co-authored, and DOJ requested specific information/opinions from each author. This issue has been resolved.
- One of DOJ's Phase 3 experts has encountered a serious health issue and will need to be replaced. The parties are working together to resolve this issue.
- DOJ had asserted that there were deficiencies with respect to PLG's Phase 2 reliance documents for experts. The parties are working together to resolve these issues and anticipate they will be able to resolve the issues.

2. Medical Examinations of Track 1 Plaintiffs

- DOJ is in the process of scheduling medical examinations for some of the Track 1 plaintiffs. DOJ has proposed dates for these evaluations, and the parties are working together to schedule these examinations.

3. Evidence Depository

- DOJ has reviewed and scanned documents in the evidence depository located in Raleigh. DOJ has been unable to complete scanning the documents and PLG is going to work with DOJ to either facilitate DOJ's completion of the scanning, or to scan and transmit the documents to DOJ.

4. Elements of a CLJA Claim and General Framework for Trial

- The parties reported that they are close to reaching an agreement as to the elements of a CLJA claim and the framework for trial, but an agreement has not yet been reached. The parties will continue working to achieve an agreement. The parties agreed that it would be helpful for the Court to know the type of evidence that will be offered in each phase of the trial. The parties represented that they should be in a position to submit an agreement or alternative proposals after the conclusion of the depositions of water modeling experts.

5. Other Matters

- The Non-Hodgkins Lymphoma and Leukemia Bladder Cancer plaintiffs have been assigned to Judge Dever. After the expert reports are submitted, the parties will discuss a potential agreement to subgroup these trials, subject to Court approval. The parties

believe this will provide for more expedient trials of the blood cancer cases. The parties also will discuss any other potential groupings of Track 1 trials.

The transcript of the January 13, 2025 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 will be held on Monday, February 10, 2025, 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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