

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
Civil Action No.: 7:23-CV-897**

IN RE:)
)
CAMP LEJEUNE WATER LITIGATION)
)
This Pleading Relates to:)
)
ALL CASES.)
)
)

**PLAINTIFFS’ MOTION FOR AN ORDER EXCLUDING CERTAIN OPINIONS OF
REMY J.-C. HENNET, PH.D.**

Pursuant to Federal Rule of Evidence 702, *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 609 U.S. 579 (1993), and the Court’s Amended Pretrial Scheduling Order [DE-312], Plaintiffs hereby move the Court for an order excluding the opinions of expert Remy J.C-. Hennet, Ph.D. regarding:

- Contaminant volatilization when water buffaloes are filled via the manhole;
- Alleged contaminant losses from disposal of spent spiractor solids, sand filter backwash water and suspended solids;
- “Anomalous” HP-634 contaminant concentration data; and
- “Representative” flow paths and travel time at TT-26.

Dr. Hennet’s opinions on these topics should be excluded because they are unreliable. In support of this motion, Plaintiffs submit and rely upon the accompanying Memorandum in Support and exhibits attached hereto.

WHEREFORE, Plaintiffs respectfully pray the Court orders as follows:

1. That the expert witness testimony of Dr. Hennes regarding the topics identified above is excluded.
2. For such other and further relief as the Court deems just and proper.

[Signature page to follow.]

DATED this 29th day of April 2025.

Respectfully submitted,

/s/ J. Edward Bell, III

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CERTIFICATE OF SERVICE

I, J. Edward Bell, III, hereby certify that the foregoing document was electronically filed on the Court's CM/ECF system on this date, and that all counsel of record will be served with notice of the said filing via the CM/ECF system.

This the 29th day of April 2025.

/s/ J. Edward Bell, III_____

J. Edward Bell, III