

EXHIBIT B

From: [Greenwald, Robin](#)
To: [Mirsky, Sara J. \(CIV\)](#); [Eric Flynn](#); [Bain, Adam \(CIV\)](#); [Lipscomb, Bridget \(CIV\)](#); [Avery Halfon - Elizabeth Cabraser](#); [Jenna Butler - Ward & Smith](#)
Cc: [CL | CO-LEAD COUNSEL](#); [Gjonaj, Diana](#); [Zach Mandell](#); [Platt, Elizabeth K. \(CIV\)](#); [Ortiz, David R \(CIV\)](#)
Subject: [EXTERNAL] Re: Follow to meet and confer re: Order 886
Date: Friday, June 26, 2026 1:29:24 PM
Attachments: [image001.png](#)

Sara and colleagues,

Thank you for the meet and confer today. As we mentioned at the end of the call, we will send you a near final draft of our submission as soon as it is ready today.

Regards,

Robin

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From: Mirsky, Sara J. (CIV) <Sara.J.Mirsky@usdoj.gov>

Date: Friday, June 26, 2026 at 12:05 PM

To: Greenwald, Robin <RGreenwald@weitzlux.com>; Eric Flynn <eflynn@belllegalgroup.com>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Avery Halfon - Elizabeth Cabraser <ahalfon@lchb.com>; Jenna Butler - Ward & Smith <JFB@wardandsmith.com>

Cc: CL | CO-LEAD COUNSEL <co-lead.counsel@belllegalgroup.com>; Gjonaj, Diana <dgjonaj@weitzlux.com>; Zach Mandell <zmandell@mbmjustice.com>; Platt, Elizabeth K. (CIV) <Elizabeth.K.Platt@usdoj.gov>; Ortiz, David R (CIV) <David.R.Ortiz@usdoj.gov>

Subject: RE: Follow to meet and confer re: Order 886

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Thanks, Robin. 1pm works for us.

Sara J. Mirsky

Assistant Director

Camp Lejeune Justice Act Section

U.S. Department of Justice

202.451.7726

sara.j.mirsky@usdoj.gov

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From: Greenwald, Robin <RGreenwald@weitzlux.com>

Sent: Friday, June 26, 2026 12:00 PM

To: Mirsky, Sara J. (CIV) <Sara.J.Mirsky@usdoj.gov>; Eric Flynn <eflynn@belllegalgroup.com>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Avery Halfon - Elizabeth Cabraser <ahalfon@lchb.com>; Jenna Butler - Ward & Smith <JFB@wardandsmith.com>

Cc: CL | CO-LEAD COUNSEL <co-lead.counsel@belllegalgroup.com>; Gjonaj, Diana <dgjonaj@weitzlux.com>; Zach Mandell <zmandell@mbmjustice.com>; Platt, Elizabeth K. (CIV) <Elizabeth.K.Platt@usdoj.gov>; Ortiz, David R (CIV) <David.R.Ortiz@usdoj.gov>

Subject: [EXTERNAL] Re: Follow to meet and confer re: Order 886

Rather than debate the points, let's do a call at 1 pm today.

We will send around a zoom invite.

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From: Mirsky, Sara J. (CIV) <Sara.J.Mirsky@usdoj.gov>

Date: Friday, June 26, 2026 at 11:05 AM

To: Greenwald, Robin <RGreenwald@weitzlux.com>; Eric Flynn <eflynn@belllegalgroup.com>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Avery Halfon - Elizabeth Cabraser <ahalfon@lchb.com>; Jenna Butler - Ward & Smith <JFB@wardandsmith.com>

Cc: CL | CO-LEAD COUNSEL <co-lead.counsel@belllegalgroup.com>; Gjonaj, Diana <dgjonaj@weitzlux.com>; Zach Mandell <zmandell@mbmjustice.com>; Platt, Elizabeth K. (CIV) <Elizabeth.K.Platt@usdoj.gov>; Ortiz, David R (CIV) <David.R.Ortiz@usdoj.gov>

Subject: RE: Follow to meet and confer re: Order 886

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Robin,

The United States disagrees with your characterization of this process, and believes our prior correspondence speaks for itself. We are available to have a meet-and-confer today, and have offered to meet-and-confer multiple times this week prior to today. We are available any time before 2pm.

PLG has had ample notice of the United States' position, and has had a draft of our Attachment A since Tuesday. PLG previously suggested it would be requesting briefing on the application of Order 886, but seemed to have dropped that request in the proposals made this week. The United States now understands that PLG intends to make a substantive filing tonight, and the United States reserves its right to seek leave to respond as is necessary.

Please let us know when you are available to discuss.

Best,
Sara

Sara J. Mirsky

Assistant Director
Camp Lejeune Justice Act Section
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202.451.7726
sara.j.mirsky@usdoj.gov

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From: Greenwald, Robin <RGreenwald@weitzlux.com>

Sent: Friday, June 26, 2026 10:14 AM

To: Mirsky, Sara J. (CIV) <Sara.J.Mirsky@usdoj.gov>; Eric Flynn <eflynn@belllegalgroup.com>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Avery Halfon - Elizabeth Cabraser <ahalfon@lchb.com>; Jenna Butler - Ward & Smith <JFB@wardandsmith.com>

Cc: CL | CO-LEAD COUNSEL <co-lead.counsel@belllegalgroup.com>; Gjonaj, Diana <dgjonaj@weitzlux.com>; Zach Mandell <zmandell@mbmjustice.com>; Platt, Elizabeth K. (CIV) <Elizabeth.K.Platt@usdoj.gov>; Ortiz, David R (CIV) <David.R.Ortiz@usdoj.gov>

Subject: [EXTERNAL] Re: Follow to meet and confer re: Order 886

Sara:

It is incorrect to suggest that the PLG is not willing to meet and confer about the submission due today. We have done so previously and are available to do so today. We propose that we have that meet and confer asap as the submission that is the subject of the meet and confer is due today. Let us know when DOJ is available.

Also, we cannot share a draft at present because it is still in the drafting stage. As you know, the PLG believes that DOJ's submission is improper; we do not believe the order asks for, nor allows, additional evidence regarding the experts. But DOJ has insisted on that approach, and as a result we have had to change course and draft a submission that identifies not only the improper process but also addresses each of the experts'

compliance with Rule 702. If we are ready to share a draft at some point today we will do so, but it is highly unlikely that we will have one to share before the end of the day. Again, that is the result of DOJ changing the rules and refusing to adopt the PLG approach to responding to the order.

We will await an email from you regarding when DOJ is available to meet and confer.

Thank you

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From: Mirsky, Sara J. (CIV) <Sara.J.Mirsky@usdoj.gov>

Date: Thursday, June 25, 2026 at 10:01 PM

To: Eric Flynn <eflynn@belllegalgroup.com>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Avery Halfon - Elizabeth Cabraser <ahalfon@lchb.com>; Jenna Butler - Ward & Smith <JFB@wardandsmith.com>

Cc: CL | CO-LEAD COUNSEL <co-lead.counsel@belllegalgroup.com>; Gjonaj, Diana <dgjonaj@weitzlux.com>; Zach Mandell <zmandell@mbmjjustice.com>; Platt, Elizabeth K. (CIV) <Elizabeth.K.Platt@usdoj.gov>; Ortiz, David R (CIV) <David.R.Ortiz@usdoj.gov>

Subject: RE: Follow to meet and confer re: Order 886

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Eric,

Based on your email, the United States understands that PLG is not agreeing to a meet-and-confer prior to tomorrow's filing deadline. As such, the United States writes to object to PLG filing the document attached to your last email. Its characterization of the United States' position is incomplete, and we do not agree with it. Furthermore, the United States does not agree that Order 886 permits each Party to "submit supporting documentation or testimony prior to ruling on admissibility . . ." at some future time. Order 886 ordered the Parties to identify the opinions that are subject to exclusion on June 26, 2026. Therefore, we cannot agree to this as a joint filing. The United States intends to comply with the Court's Order and file the Attachment A that we previously provided to you (attached here with minor redlines from the last version we sent) along with a notice detailing the Parties' meet and confer attempts.

If PLG intends to file supporting documentation or an edited version of PLG's latest Proposed Order, the United States reiterates its request to review the documents prior to filing, as the United States has provided its filing in advance.

Best,
Sara

Sara J. Mirsky

Assistant Director
Camp Lejeune Justice Act Section
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202.451.7726
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From: Eric Flynn <EFlynn@belllegalgroup.com>
Sent: Thursday, June 25, 2026 4:00 PM
To: Mirsky, Sara J. (CIV) <Sara.J.Mirsky@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Robin Greenwald <rgreenwald@weitzlux.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Avery Halfon - Elizabeth Cabraser <ahalfon@lchb.com>; Jenna Butler - Ward & Smith <JFB@wardandsmith.com>
Cc: CL | CO-LEAD COUNSEL <co-lead.counsel@belllegalgroup.com>; Diana Gjonaj-Robin Greenwald <dgjonaj@weitzlux.com>; Zach Mandell <zmandell@mbmjustice.com>; Platt, Elizabeth K. (CIV) <Elizabeth.K.Platt@usdoj.gov>; Ortiz, David R (CIV) <David.R.Ortiz@usdoj.gov>
Subject: [EXTERNAL] Re: Follow to meet and confer re: Order 886

Thank you, Sara.

We have revised our proposed order to, we believe, address the concerns you raise below. We believe the attached conforms to the Court's order. As such, if we cannot agree on the terms of the proposed order, we will file the attached on Friday and anticipate a separate filing from the United States.

Sincerely

Eric

Eric Flynn
Partner
Bell Legal Group

From: Mirsky, Sara J. (CIV) <Sara.J.Mirsky@usdoj.gov>

Date: Thursday, June 25, 2026 at 11:57 AM

To: Eric Flynn <EFlynn@belllegalgroup.com>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Robin Greenwald <rgreenwald@weitzlux.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>

Cc: CL | CO-LEAD COUNSEL <co-lead.counsel@belllegalgroup.com>; Diana Gjonaj-Robin Greenwald <dgjonaj@weitzlux.com>; Zach Mandell <zmandell@mbmjustice.com>; Platt, Elizabeth K. (CIV) <Elizabeth.K.Platt@usdoj.gov>; Ortiz, David R (CIV) <David.R.Ortiz@usdoj.gov>

Subject: RE: Follow to meet and confer re: Order 886

Eric,

Order 886 requires that the Parties “file within 21 days a joint proposed order that identifies expert opinions to which this order applies, for consideration by Chief Judge Myers, Judge Boyle, and Judge Dever individually.” The United States does not believe that Paragraph 2 as currently written complies with that requirement. While it does include the list of experts the United States outlined in its previously proposed “Attachment A,” it does not include the experts’ opinions, some of which the United States detailed in Attachment A. The United States would be willing to include the contents of Attachment A into a Joint Proposed Order if that would be amenable to PLG. However, as written, the United States does not agree with PLG’s proposed order sent on June 24.

Furthermore, PLG’s statement in Paragraph 2 merely contends that the experts, and not their opinions, meet the Rule 702 and Order 886 requirements. The United States believes this is deficient.

The United States also disagrees with the references to D.E. 818 in Paragraph 3 and in the “Accordingly” paragraph. Order 886 requires the Parties to identify PLG’s experts’ opinions that are violative of Rule 702 because the experts modified their methodologies under the “at least as likely as not” burden of proof. The United States believes that a recitation to D.E. 818 is irrelevant to the Court’s instructions under Order 886 and should be removed.

Best,
Sara

Sara J. Mirsky

Assistant Director

Camp Lejeune Justice Act Section

U.S. Department of Justice

202.451.7726

sara.j.mirsky@usdoj.gov

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From: Eric Flynn <EFlynn@belllegalgroup.com>
Sent: Thursday, June 25, 2026 11:11 AM
To: Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Robin Greenwald <rgreenwald@weitzlux.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>
Cc: CL | CO-LEAD COUNSEL <co-lead.counsel@belllegalgroup.com>; Diana Gjonaj-Robin Greenwald <dgjonaj@weitzlux.com>; Zach Mandell <zmandell@mbmjustice.com>; Mirsky, Sara J. (CIV) <Sara.J.Mirsky@usdoj.gov>; Platt, Elizabeth K. (CIV) <Elizabeth.K.Platt@usdoj.gov>; Ortiz, David R (CIV) <David.R.Ortiz@usdoj.gov>
Subject: [EXTERNAL] Re: Follow to meet and confer re: Order 886

Thanks, Adam.

While we discuss internally, can you please advise what your objections are to the proposed order we attached to yesterday's email? We will circle up with our team to obtain times for a meet and confer today, but it would be helpful to have your thoughts on our proposed order in advance.

Sincerely

Eric

Eric Flynn
Partner
Bell Legal Group

From: Bain, Adam (CIV) <Adam.Bain@usdoj.gov>
Date: Wednesday, June 24, 2026 at 9:26 PM
To: Eric Flynn <EFlynn@belllegalgroup.com>; Robin Greenwald <rgreenwald@weitzlux.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>
Cc: CL | CO-LEAD COUNSEL <co-lead.counsel@belllegalgroup.com>; Diana Gjonaj-Robin Greenwald <dgjonaj@weitzlux.com>; Zach Mandell <zmandell@mbmjustice.com>; Mirsky, Sara J. (CIV) <Sara.J.Mirsky@usdoj.gov>; Platt, Elizabeth K. (CIV) <Elizabeth.K.Platt@usdoj.gov>; Ortiz, David R (CIV) <David.R.Ortiz@usdoj.gov>
Subject: RE: Follow to meet and confer re: Order 886
Thanks, Eric,

The United States does not believe it has misstated any of PLG's positions (**which PLG drafted and provided on June 17, 2026**), and PLG is welcome to propose redlines to our

version of PLG's previously proposed order. However, United States cannot agree to the PLG's new proposed order. We welcome a further meet and confer if PLG is available on Thursday. Please let us know when you are available.

In addition, the United States requests that PLG make a proposal for how separate submissions would be filed. The United States also requests that PLG send any proposed submission for the United States' review prior to any filing occurring, as the United States has done for PLG. Please provide any proposed submission by Friday morning.

Please include Sara Mirsky, David Ortiz, and Elizabeth Platt (all copied here) as well as Bridget and me, on any further communications regarding this matter.

Best,

Adam



Adam Bain
Chief Litigation Counsel
Camp Lejeune Justice Act Section
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202-598-0930
adam.bain@usdoj.gov

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From: Eric Flynn <EFlynn@belllegalgroup.com>

Sent: Wednesday, June 24, 2026 5:41 PM

To: Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Robin Greenwald <rgreenwald@weitzlux.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>

Cc: CL | CO-LEAD COUNSEL <co-lead.counsel@belllegalgroup.com>; Diana Gjonaj-Robin Greenwald <dgonaj@weitzlux.com>; Zach Mandell <zmandell@mbmjustice.com>

Subject: [EXTERNAL] Re: Follow to meet and confer re: Order 886

Adam

Thank you for your correspondence. We believe your proposed order exceeds the scope of what the court asked for in its order, which is a list of experts. We further believe the proposed order misstates our positions. To the extent a meet and confer would be useful, we are happy to do so.

If we cannot come to agreement, we will file a separate submission, as the parties have done in the past when unable to reach agreement.

Sincerely

Eric

Eric Flynn
Partner
Bell Legal Group

From: Bain, Adam (CIV) <Adam.Bain@usdoj.gov>

Date: Tuesday, June 23, 2026 at 4:50 PM

To: Robin Greenwald <rgreenwald@weitzlux.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>

Cc: CL | CO-LEAD COUNSEL <co-lead.counsel@belllegalgroup.com>; Diana Gjonaj-Robin Greenwald <dgjonaj@weitzlux.com>; Zach Mandell <zmandell@mbmjustice.com>

Subject: RE: Follow to meet and confer re: Order 886
Robin and PLG,

Enclosed please find our revision of the Joint Submission and our Proposed Order adopting the government's position to be attached as Attachment A.

If you intend to propose revisions to the Joint Submission and provide your own attached Proposed Order please provide to us by noon on Thursday, so there is time to have a meet and confer, if necessary, before Friday's submission deadline.

Best,

Adam

| Adam Bain



Chief Litigation Counsel
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From: Bain, Adam (CIV)
Sent: Monday, June 22, 2026 5:07 PM
To: 'Greenwald, Robin' <RGreenwald@weitzlux.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>
Cc: 'CL | CO-LEAD COUNSEL' <co-lead.counsel@belllegalgroup.com>; 'Gjonaj, Diana' <dgjonaj@weitzlux.com>; 'Zach Mandell' <zmandell@mbmjustice.com>
Subject: RE: Follow to meet and confer re: Order 886

Robin and PLG,

Our preliminary view is that we will not be seeking to exclude the opinions of your general causation experts, Drs. Felsher, Hu, Plunkett, Gilbert, Savitz or Madigan at this time. However, we reserve our right to challenge these experts under the reasoning of Order 886, as well as challenge your specific causation experts under the reasoning of Order 886, at the appropriate time.

Best,

Adam



Adam Bain
Chief Litigation Counsel
Camp Lejeune Justice Act Section
U.S. Department of Justice

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From: Bain, Adam (CIV)
Sent: Thursday, June 18, 2026 3:18 PM
To: 'Greenwald, Robin' <RGreenwald@weitzlux.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>
Cc: CL | CO-LEAD COUNSEL <co-lead.counsel@belllegalgroup.com>; Gjonaj, Diana <dgjonaj@weitzlux.com>; Zach Mandell <zmandell@mbmjustice.com>
Subject: RE: Follow to meet and confer re: Order 886

Robin and PLG,

Thank you for your e-mail and draft proposed order.

Tomorrow is a federal holiday, but we can provide you with a list of PLG expert opinions we believe are presently excluded by the rationale of Order 886 on Monday.

On Tuesday, we can provide you with a redline of the proposed joint submission, at which time we will indicate the evidence that we believe supports the exclusion of those expert opinions.

We do not believe that any additional briefing is necessary; though we will provide briefing if the Court deems it is needed after receiving the parties' submission.

We can be available to meet and confer with you later in the week.

Best,

Adam

Adam Bain
Chief Litigation Counsel



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From: Greenwald, Robin <RGreenwald@weitzlux.com>
Sent: Wednesday, June 17, 2026 4:05 PM
To: Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>
Cc: CL | CO-LEAD COUNSEL <co-lead.counsel@belllegalgroup.com>; Gjonaj, Diana <dgjonaj@weitzlux.com>; Zach Mandell <zmandell@mbmjustice.com>
Subject: [EXTERNAL] Follow to meet and confer re: Order 886

Adam and colleagues:

Thank you for yesterday's discussion regarding implementation of the Court's order at D.E. 886 (the "Order"). As we stated, the PLG does not agree with the United States' view of the experts or opinions to which the Order applies. The PLG's position is that the Order does not affect any of its general causation opinions and that none of its experts violated it.

First, the five-page limitation the United States proposed is not workable, nor is it fair to the PLG, given that this is the United States' challenge. There is no way to present, in five pages, the full context of over a dozen experts' report and deposition testimony needed to show that the experts applied a proper and reliable methodology. That is especially true here, where the United States contends that all but one of the PLG's general causation experts should be excluded – requiring the PLG to respond to challenges to nearly every one of its general causation experts

Second, and relatedly, the PLG does not agree to simultaneous submissions. As with any challenge to the admissibility of an expert, the United States should file first – identifying the experts and opinions it contends are subject to the Order, and the bases for its position – and the PLG should then have a fair opportunity to respond.

Third, to permit a meaningful meet and confer and any response that may follow, please confirm:

1. Whether the entries in D.E. 540-1 are the totality of the quotations the United States relies upon to contend that the PLG's experts do not satisfy the Order, or whether the United States intends to rely on additional references to the experts' reports and/or deposition transcripts; and
2. The complete list of the PLG's general causation experts the United States contends violated the Order, together with confirmation of any experts, in addition to Dr. Felsher, that the United States agrees comply with it.

We ask that the United States provide the list of experts by Friday, June 19. To the extent it intends to rely on any materials beyond D.E. 540-1, we ask that it produce those references on a rolling basis and in no event later than Monday, June 22.

We also enclose a proposed order setting forth the parties' respective positions for the Court, consistent with the Order's direction that the parties identify the opinions to which the Order applies. Should the United States insist on the five-page format suggested on yesterday's call or on simultaneous submissions, the PLG intends to seek clarification from the Court regarding the appropriate process for implementing the Order.

Given the Court's deadline, please let us know the United States' position by Thursday, June 18.

Regards,

Plaintiff's Leadership Group

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