

Exhibit C

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

IN RE:

Case Number 7:23-CV-897

CAMP LEJEUNE WATER LITIGATION

JUNE 22, 2026
STATUS CONFERENCE
BEFORE THE HONORABLE ROBERT B. JONES, JR.
UNITED STATES MAGISTRATE JUDGE

APPEARANCES:

On Behalf of the Plaintiffs:

A. Charles Ellis, Esquire
J. Edward Bell, III, Esquire (Via Telephone)
Jim Roberts, Esquire
Eric Flynn, Esquire
Jenna Butler, Esquire
Mona Lisa Wallace, Esquire
Hugh R. Overholt, Esquire (Via Telephone)
Robin Greenwald, Esquire (Via Telephone)

On Behalf of the Defendant:

J. Adam Bain, Esquire
Joshua Carpenito, Esquire
Jonathan Gynn, Esquire
John Adams, Esquire
Sara Mirsky, Esquire (Via Telephone)

Bobbie J. Shanfelder, RDR, CRR
Official Court Reporter
Bobbie_Shanfelder@nced.uscourts.gov

11:14:35AM 1 DOBs are even eligible for Track 2 because they have a Track
11:14:41AM 2 2 disease as a primary or how many of those intend to pursue
11:14:44AM 3 the Track 2 disease as the primary for purposes of the
11:14:47AM 4 litigation. Assuming that a similar Track 1 order would be
11:14:51AM 5 entered limiting a person to just recovery for the Track 1
11:14:55AM 6 disease or Track 2 disease and not subsequent diseases and
11:14:59AM 7 unless it's related. So there are a lot of orders and
11:15:04AM 8 procedural milestones that I would think a party would want
11:15:08AM 9 to know the answer to before embarking on discovery and
11:15:12AM 10 ordering records.

11:15:13AM 11 THE COURT: How many Plaintiffs fall into this
11:15:16AM 12 no date of birth or no social security number?

11:15:18AM 13 MR. FLYNN: Off the top of my head, I think it's
11:15:20AM 14 maybe 14.

11:15:21AM 15 THE COURT: And do we know of those how many
11:15:25AM 16 would presumably be in Track 2?

11:15:27AM 17 MR. FLYNN: I do not, Your Honor.

11:15:29AM 18 THE COURT: Do you know, Mr. Carpenito?

11:15:31AM 19 MR. CARPENITO: No, sir, I do not.

11:15:33AM 20 MR. FLYNN: With respect to previously I think
11:15:35AM 21 Mr. Carpenito mentioned or at least he mentioned in his
11:15:38AM 22 letter the EO process that is now available to people who
11:15:46AM 23 have filed complaints in court. Well, the DOJ's office has
11:15:48AM 24 reached out to counsel. They have reached out to our firm
11:15:51AM 25 for sure with a list of people they would like more

11:15:56AM 1 substantiating information on and gave us a deadline to do
11:15:58AM 2 it. So we are interfacing with them.

11:16:02AM 3 THE COURT: To recapture those folks and bring
11:16:05AM 4 them back into EO?

11:16:07AM 5 MR. FLYNN: Different folks, yes, Your Honor.
11:16:07AM 6 So before, remember, that under the original Elective Option
11:16:09AM 7 program, once you filed the complaint in court past a certain
11:16:11AM 8 date, you are out. Now Mr. Woodward issued an order that
11:16:16AM 9 said, okay, they are back in. So there's a group of folks
11:16:19AM 10 that we received notice from the DOJ that said you have until
11:16:24AM 11 X date to give us substantiating documents.

11:16:27AM 12 THE COURT: Do you know how many of those are?

11:16:28AM 13 MR. FLYNN: I think there are nine in our firm.
11:16:31AM 14 I don't know about the other firms, Your Honor. So the DOJ's
11:16:34AM 15 office seems to be pretty capable of reaching out to us when
11:16:38AM 16 they want substantiating information for purposes of
11:16:41AM 17 evaluating an EO. Our office is looking at them. I'm sure
11:16:45AM 18 the other offices that have received these are looking at it
11:16:48AM 19 as well.

11:16:49AM 20 I think the point is, Your Honor, that, yes,
11:16:52AM 21 it's a Court Order and we should follow Court Orders and I
11:16:56AM 22 fully agree with that. We are working with them to get them
11:16:59AM 23 into compliance. Dismissal is rather Draconian and I don't
11:17:06AM 24 know that the last thing -- that the first thing the Court
11:17:08AM 25 wants are more motions practice particularly in cases that

11:21:09AM 1 the Court to always take an approach that enables as many of
11:21:17AM 2 the critical universal issues to be handled at once to
11:21:21AM 3 efficiently use time and court resources.

11:21:25AM 4 In terms of moving the cases along fast enough,
11:21:27AM 5 we think it's just important to emphasize again to the Court
11:21:30AM 6 as it's thinking about how to move forward in the coming
11:21:34AM 7 months and year that ultimately it was Plaintiffs and their
11:21:37AM 8 counsel who asked Congress for a tort cause of action, not a
11:21:41AM 9 compensation scheme. And this Court has designed a schedule
11:21:46AM 10 so that these tort causes of action could be efficiently and
11:21:51AM 11 effectively adjudicated.

11:21:53AM 12 And as I mentioned before, the Court designed an
11:21:56AM 13 aggressive but fair set of deadlines and a track scheme which
11:22:00AM 14 the parties have worked hard to meet. We've requested
11:22:04AM 15 reasonable extensions. So did Plaintiffs. But we think both
11:22:07AM 16 sides have been faithful in trying to do what the Court asked
11:22:12AM 17 us to do.

11:22:13AM 18 And this is a massive case. This is the biggest
11:22:16AM 19 liability on the United States' balance sheet. But we are --
11:22:21AM 20 the face value of these claims, Your Honor, as I am sure you
11:22:23AM 21 are aware, is over 330 trillion dollars. So the Department
11:22:28AM 22 of Justice just wants to articulate its gratitude for the
11:22:32AM 23 careful approach the Court has taken to move these along
11:22:34AM 24 quickly but appropriately.

11:22:36AM 25 In terms of respecting our veterans, the men and

11:22:41AM 1 women who served our country, Your Honor, of course the
11:22:44AM 2 Government continues to provide medical care and benefits and
11:22:48AM 3 to provide for any other needs of them and their families.

11:22:52AM 4 In terms of this case, Your Honor, I think that
11:22:55AM 5 you see the stats but I just think it would be helpful to
11:22:59AM 6 articulate again over 740 million dollars have been paid to
11:23:04AM 7 settle Camp Lejeune Justice Act claims. I don't know about
11:23:08AM 8 you, but where I am from that's a lot of money. And nearly 1
11:23:13AM 9 billion dollars has been offered to settle the claims, and
11:23:16AM 10 many of those offers are still outstanding.

11:23:19AM 11 I think that the record shows that this Court
11:23:22AM 12 and the Department of Justice in partnership with Plaintiffs
11:23:25AM 13 across the aisle, we have worked hard to move one of the most
11:23:29AM 14 consequential pieces of litigation forward efficiently
11:23:33AM 15 notwithstanding whatever the reporting is from naysayers.

11:23:39AM 16 And so we have just looking ahead we also wanted
11:23:43AM 17 to just briefly thank the Court. And I can't say that I am
11:23:48AM 18 speaking for Plaintiffs but they are very gracious so maybe I
11:23:51AM 19 am, but to thank the Court for recent steps the Court has
11:23:54AM 20 taken to help signal value in these cases which the parties
11:23:58AM 21 so desperately need to resolve as many cases as quickly as we
11:24:06AM 22 can. And I am referring specifically to the recent ruling on
11:24:09AM 23 offsets, and I am also referring to the recent rulings on the
11:24:13AM 24 at-least-as-likely-as-not standard and how it applies to
11:24:16AM 25 expert testimony.