

Exhibit 39

RELIANCE LIST FOR REBUTTAL REPORT

1. Issue of *Leatherneck* dated April 1955.³⁶
2. Oral history notes/email, reflecting discussions/communications with retired Master Sergeant J.M. Ensminger (USMC, Ret.).
3. Oral history notes from discussions with Mr. Michael Partain.
4. Testimony of Partain (1).³⁷
5. Testimony of Partain (2).³⁸
6. Nonprofit website, "The Few, The Proud, the Forgotten."³⁹
7. Mike Partain's TFTPTF Timeline (1941-1989) Updated 03.10.12.⁴⁰
8. "Yale" documents reflecting VA use of Partain website.
9. Partain, Michael, Thesis, "Camp Lejeune Digital Community Archive Project: An Analysis of Digital Public History Efforts to Achieve Social Justice for the Camp Lejeune Drinking Water Contamination 1999-2017" (University of Central Florida, May 2021). *Electronic Theses and Dissertations, 2020-2023*.⁴¹
10. ATSDR Hadnot Point map.⁴²
11. The Camp Lejeune *Globe*, 10 August 1972.⁴³
12. The Camp Lejeune *Globe*, 21 September 1961.⁴⁴
13. Naval Medical Center Camp Lejeune entry for "Mainside Branch" Medical Clinic (Building 15).⁴⁵
14. Map specifying the "Main Side C Store."⁴⁶

³⁶ issue available at https://archive.org/details/sim_leatherneck_1955-04_38_4

³⁷ https://republicans-science.house.gov/_cache/files/e/2/e2d4a1f2-d82e-45e9-b284-449754bf6aff/6917E476C613D3421FFAF940A8975922.091610-partain.pdf

³⁸ <https://www.veterans.senate.gov/services/files/071BA053-6068-4305-9337-5243828435C4>

³⁹ <https://www.tftptf.com/>

⁴⁰ <https://www.tftptf.com/5873.html>

⁴¹ <https://stars.library.ucf.edu/etd2020/543/>

⁴² https://www.atsdr.cdc.gov/camp-lejeune/media/pdfs/2024/10/masterplate_hadnotpoint.pdf

⁴³ <https://www.dvidshub.net/publication/issues/60724>

⁴⁴ <https://www.dvidshub.net/publication/issues/61751>

⁴⁵ <https://camp-lejeune.tricare.mil/Branch-Medical-Clinics>

⁴⁶ https://www.mcicest.marines.mil/portals/33/documents/contracting/contracting_map.pdf

15. Photo of “Main Side C-Store” from Base Exterior Architectural Plan (BEAP), Marine Corps Base (MCB) Camp Lejeune and Marine Corps Air Station (MCAS) New River.⁴⁷
16. The Camp Lejeune *Globe*, 26 July 1962.⁴⁸
17. The Camp Lejeune *Globe*, 11 August 1983.⁴⁹
18. The Camp Lejeune *Globe*, 4 December 1975.⁵⁰
19. The Camp Lejeune *Globe*, 30 April 1964.⁵¹
20. The Camp Lejeune *Globe*, 3 June 1965.⁵²
21. The Camp Lejeune *Globe*, 10 October 1985.⁵³
22. The Camp Lejeune *Globe*, 5 October 1972.⁵⁴
23. The Camp Lejeune *Globe*, 20 January 1956.⁵⁵
24. The Camp Lejeune *Globe*, 8 October 1981.⁵⁶
25. The Camp Lejeune *Globe*, 11 May 1978.⁵⁷
26. Photo from Mike Partain archives.⁵⁸
27. Dr. Mike Gros – Mike Magner, *A Trust Betrayed: The Untold Story of Camp Lejeune and the Poisoning of Generations of Marines and Their Families* (DaCapo Press, 2014), 113-117.
28. Deposition of Terry Dyer, 10 April 2024 (previously produced).
29. Stetson University Bogue Field project, <https://www.stetson.edu/law/veterans/bogue-field.php>.
30. Exhibit 9 from David Greer Deposition (previously produced).

⁴⁷ <https://www.lejeune.marines.mil/Portals/27/Documents/EMD/Cultural-Resources/BEAP.pdf>

⁴⁸ <https://www.dvidshub.net/publication/issues/61612>

⁴⁹ <https://www.dvidshub.net/publication/issues/59319>

⁵⁰ <https://www.dvidshub.net/publication/issues/60210>

⁵¹ <https://www.dvidshub.net/publication/issues/61312>

⁵² <https://www.dvidshub.net/publication/issues/61241>

⁵³ <https://www.dvidshub.net/publication/issues/58953>

⁵⁴ <https://www.dvidshub.net/publication/issues/60716>

⁵⁵ <https://www.dvidshub.net/publication/issues/62469>

⁵⁶ <https://www.dvidshub.net/publication/issues/59545>

⁵⁷ <https://www.dvidshub.net/publication/issues/59993>

⁵⁸ Copy available at <https://www.ucf.edu/news/ucf-history-grad-helps-secure-justice-for-military-families-exposed-to-toxic-water/>

31. Deposition of General Anthony Charles Zinni, 28 May 2024 (previously produced).
32. *The Globe*, 18 June 1981.⁵⁹
33. *The Globe*, 15 October 1987.⁶⁰
34. Deposition of Lt. Colonel William Walters, 20 May 2024 (previously produced).
35. Deposition of James Claude Branham, Jr., Salisbury, North Carolina, 16 October 2024.
36. Demonstrative photo of “cattle car.”⁶¹

⁵⁹ <https://www.dvidshub.net/publication/issues/59564>

⁶⁰ <https://www.dvidshub.net/publication/issues/58564>

⁶¹ https://www.reddit.com/r/USMC/comments/11w8u9s/i_bet_you_know_what_this_is/?rdt=60395.