Exhibit 71

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

IN RE:	)	
	)	
CAMP LEJEUNE WATER LITIGATION	)	
	)	
This Document Relates to:	)	Case Nos.:
	)	
ALL CASES	)	7:23-CV-897
	)	
JEFFERSON CRISWELL	)	7:23-CV-1482
	)	
TERRY F. DYER	)	7:23-CV-357
	)	
MARK A. CAGIANO	)	7:23-CV-569
	)	
JIMMY LARAMORE	)	7:23-CV-594
	)	
EDWARD RAYMOND	)	7:23-CV-546

PLAINTIFFS' DESIGNATION AND DISCLOSURE OF PHASE II EXPERT WITNESSES WITH RESPECT TO BLADDER CANCER

STEPHEN H. CULP, M.D., Ph.D.'S RELIANCE FILES

Pursuant to Fed. R. Civ. P. 26(a)(2)(B)(ii) and the Stipulated Order Regarding Expert Discovery (Case Management Order No. 17) (D.E. 305), Plaintiffs hereby identify the facts, data, and publications considered by Stephen H. Culp, M.D., Ph.D. ("Dr. Culp") in forming his opinions concerning general causation and bladder cancer.

Dr. Culp's report contains a thorough statement of the facts, data, and publications that he considered in forming his opinions. Plaintiffs incorporate all facts, data, and publications referenced in Dr. Culp's report as if fully listed herein. In addition, Plaintiffs identify the following facts, data, and publications considered by Dr. Culp in forming his opinions.

1. "Anatomy of the Bladder." Saint Luke's, https://www.saintlukeskc.org/health-library/anatomy-bladder;

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128. Water Modeling Data – Appendices I, J, H1 & K to Morris Malia's report in the above-captioned matter, dated October 25, 2024;

129. Deposition of Frank Bove;

130. Deposition of Morris Maslia;

131. The Camp Lejeune Justice Act;

132. Order, *In re: Camp Lejeune Water Litigation*, No. 7:23-CV-897, Dkt. No. 227 (E.D.N.C. June 5, 2024);

133. Order, *In re: Camp Lejeune Water Litigation*, No. 7:23-CV-897, Dkt. No. 247 (E.D.N.C. June 28, 2024);

134. Report of Benjamin Hatten, M.D., M.P.H., bladder cancer;

135. Report of Laura M. Plunkett, Ph.D., DABT, bladder cancer;

136. Report of Morris L. Maslia, P.E., D.WRE, DEE, Fellow EWRI;

137. Report of Kathleen M. Gilbert, PhD; TCE, PCE, benzene and bladder cancer;

138. Report of Steven B. Bird, MD, bladder cancer;

139. All facts and data listed herein are either identified by bates number or are publicly available to and accessible by Defendant United States of America;

140. Dr. Culp reserves the right to review and consider additional facts, data and publications;

141. Dr. Culp reserves the right to consider the report of any other witness in this action; and

142. Dr. Culp reserves the right to supplement this list of reliance files.