

Exhibit 77

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
)	
MARK CAGIANO)	7:23-CV-00569
)	
JEFFERSON MICHAEL CRISWELL)	7:23-CV-01482
)	
TERRY DYER)	7:23-CV-00357
)	
JIMMY LARAMORE)	7:23-CV-00594
)	
EDWARD RAYMOND)	7:23-CV-00546

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

**MATERIALS CONSIDERED LIST FOR BENJAMIN HATTEN, MD, MPH ON
PLAINTIFFS MARK CAGIANO, JEFFERSON MICHAEL CRISWELL, TERRY DYER,
JIMMY LARAMORE, AND EDWARD RAYMOND**

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 Benjamin Hatten, MD, MPH ("Dr. Hatten") in forming his opinions set forth in his reports concerning Plaintiffs Mark Cagiano, Jefferson Michael Criswell, Terry Dyer, Jimmy Laramore, and Edward Raymond served on February 7, 2024 ("Dr. Hatten's Reports").

Dr. Hatten's Reports are a supplement to his General Causation Report served on December 9, 2024 which contains a thorough statement and incorporations of the facts, data, and publications that he considered in forming his opinions, primarily identified in Section IX "Materials

Considered.” Plaintiffs incorporate all facts, data, and publications referenced in Dr. Hatten’s Reports as if fully listed herein. Unless otherwise stated below, any facts, data or publications cited in Dr. Hatten’s Reports are either publicly available or were previously produced by Plaintiffs. Plaintiffs specifically identify the following facts, data, and publications considered by Dr. Hatten in forming his opinions for the Bladder Cancer plaintiffs in his Supplemental Reports produced February 7, 2025:

1. Exposure Profile and submitted charts of Dr. Kelly Reynolds, MSPH, PhD, with regard to Mark Cagiano, Jefferson Michael Criswell, Terry Dyer, Jimmy Laramore, and Edward Raymond;
2. With regard to plaintiff **Mark Cagiano**:
 - a. Deposition Transcript – Mark Cagiano – February 8, 2024
 - b. 00569_CAGIANO_0000002982
 - c. 00569_CAGIANO_0000002983
 - d. 00569_CAGIANO_0000002988
 - e. 00569_CAGIANO_0000002989
 - f. 00569_CAGIANO_0000002994
 - g. 00569_CAGIANO_0000003008
 - h. 00569_CAGIANO_0000003011
 - i. 00569_CAGIANO_VBA_0000001737-38
3. With regard to plaintiff **Jefferson Michael Criswell**:
 - a. Deposition Transcript of Mike Criswell dated March 12, 2024
 - b. Deposition Transcript of Mike Criswell dated April 19, 2024
 - c. 01482_CRISWELL_VBA_0000003543

- d. CLJA_Housing-0000148896
- 4. With regard to plaintiff **Terry Dyer**:
 - a. Deposition Transcript – Terry Dyer – April 10, 2024
 - b. CLJA_Housing-0000148896
 - c. CLJA_Housing-0000165783
 - d. CLJA_Housing-0000171911
 - e. CLJA_Housing-0000175670
- 5. With regard to plaintiff **Jimmy Laramore**:
 - a. Deposition Transcript of Jimmy Laramore dated April 2, 2024
 - b. 000594_LARAMORE_NARA-0000000011
- 6. With regard to plaintiff **Edward Raymond**:
 - a. Deposition Transcript of Edward Raymond dated March 28, 2024
 - b. 00546_RAYMOND_NARA_0000000011
 - c. 00546_RAYMOND_NARA_0000000060
 - d. 00546_RAYMOND_NARA_0000000096
 - e. 00546_RAYMOND_VA_000000414
 - f. 00546_RAYMOND_VA_000000429
- 7. 40 CFR Part 751, Federal Register Vol. 89, No. 242 – 102568 (December 17, 2024) and
Vo. 89, No. 243 -103560 (December 18, 2024) (EPA 2024).
- 8. Deposition of Dr. Bove
- 9. Expert Report of Morris L. Maslia, PE, DWRE, DEE, Fellow EWRI, including
Appendices H1, J, and K;

10. 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;
11. Dr. Hatten reserves the right to review and consider additional facts, data and publications;
12. Dr. Hatten reserves the right to supplement this Materials Considered List;
13. Dr. Hatten reserves the right to consider the report of any other witness in this action; and