

Exhibit 63

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:)
All Cases, 7:23-CV-897)
Jefferson Criswell v. USA, 7:23-CV-1482)
Terry F. Dyer v. USA, 7:23-CV-357)
Mark A. Cagiano v. USA, 7:23-CV-569)
Jimmy Laramore v. USA, 7:23-CV-594)
Edward Raymond v. USA, 7:23-CV-546)
Frank Mousser v. USA, 7:23-CV-667)
Allan W. Howard v. USA, 7:23-CV-490)
David W. Fancher v. USA, 7:23-CV-275)
David Downs v. USA, 7:23-CV-1145)
Jacqueline Tukes v. USA, 7:23-CV-1553)
Joseph M. Gleesing v. USA, 7:23-CV-1486)
Vivian Connard, Representative of Stephen)
Matthew Connard v. USA, 7:23-CV-1557)
Bruce W. Hill v. USA, 7:23-CV-28)
Robert Fiolek v. USA, 7:23-CV-62)
Karen Marie Amsler v. USA, 7:23-CV-284)
Frances Carter, Personal Representative of the)
Estate of Ronald Carter v. USA, 7:23-CV-1565)
Robert A. Kidd v. USA, 7:23-CV-1489)
Cometto Davis v. USA, 7:23-CV-43)
Jose Vidana v. USA, 7:23-CV-1575)
Scott Keller v. USA, 7:23-CV-1501)
Edgar Allen Peterson, IV v. USA, 7:23-CV-1576)
Gary McElhiney v. USA, 7:23-CV-1368)
Diane Rothchild v. USA, 7:23-CV-858)
Robert Welch v. USA, 7:23-CV-1503)
Richard Sparks v. USA, 7:23-CV-682)

**PLAINTIFFS' DESIGNATION AND DISCLOSURE OF PHASE II EXPERT
WITNESSES**

Pursuant to Fed. R. Civ. P. 26(a)(2) and the Court's Order of August 7, 2024 (D.E. 270),
the Plaintiffs' Leadership Group and the Track 1 Trial Plaintiffs (collectively, "Plaintiffs"),

through undersigned counsel, hereby designate the following Phase II expert witnesses who may be called to offer opinion testimony on the subject of general causation and Track 1 illnesses:

KIDNEY CANCER

Track 1 Trial Plaintiffs for kidney cancer, namely Plaintiffs David Downs, David William Fancher, Allan Wayne Howard, Frank W. Mousser, and Jacqueline Jordan Tukes, hereby designate the following experts who may be called upon to offer opinion testimony on the subject of general causation and kidney cancer:

1. **Steven B. Bird, MD**
6 Laurel Ridge Lane
Shrewsbury, MA 01545
2. **Michael D. Freeman, MedDr, PhD, MScFMS, MPH**
Forensic Research & Analysis
P.O. Box 96309
Portland, OR 97296
3. **Kathleen M. Gilbert, PhD**
240 West 75th Street, Apt. 1B,
New York, NY 10023
4. **Benjamin Hatten, MD, MPH**
Toxicology Associates, PLLC
26 West Dry Creek Circle, Ste. 325
Littleton, CO 80120
5. **Timothy M. Mallon, MD, MPH, MS**
6508 Folded Leaf Square
Columbia, MD 21044

Track 1 Trial Plaintiff Allan Wayne Howard (“Mr. Howard”) suffers from two Track 1 illnesses: namely, kidney cancer and non-Hodgkin lymphoma. Therefore, in addition to the above-listed expert witnesses, Mr. Howard designates all expert witnesses identified below under the non-Hodgkin lymphoma section of this disclosure.

BLADDER CANCER

Track 1 Trial Plaintiffs for bladder cancer, namely Plaintiffs Terry F. Dyer, Jefferson Criswell, Jimmy Laramore, Mark A. Cagiano, and Edward Raymond, hereby designate the following experts who may be called upon to offer opinion testimony on the subject of general causation and bladder cancer:

1. **Steven B. Bird, MD**
6 Laurel Ridge Lane
Shrewsbury, MA 01545
2. **Stephen H. Culp, MD, PhD**
University of Virginia School of Medicine, Department of Urology
Box 800422
Charlottesville, VA 22909
3. **Kathleen M. Gilbert, PhD**
240 West 75th Street, Apt. 1B
New York, NY 10023
4. **Benjamin Hatten, MD, MPH**
Toxicology Associates, PLLC
26 West Dry Creek Circle, Ste. 325
Littleton, CO 80120
5. **Laura M. Plunkett, PhD, DABT**
BioPolicy Solutions, LLC
1127 Eldridge Pkwy, Suite 300-335
Houston, TX 77077

LEUKEMIA

Track 1 Trial Plaintiffs for leukemia, namely Plaintiffs Bruce Wayne Hill, Joseph Mark Gleesing, Robert J. Fiolek, Vivian Connard (on behalf of decedent Stephen Matthew Connard), and Karen Marie Amsler, hereby designate the following experts who may be called upon to offer opinion testimony on the subject of general causation and leukemia:

1. **Steven B. Bird, MD**
6 Laurel Ridge Lane
Shrewsbury, MA 01545

- 2. Dean W. Felsher, MD, PhD**
Stanford University School of Medicine
Center for Clinical Sciences Research (CCSR) Building
269 Campus Drive
Stanford, CA 94305-5151
- 3. Kathleen M. Gilbert, PhD**
240 West 75th Street, Apt. 1B
New York, NY 10023
- 4. Lukasz P. Gondek, MD, PhD**
1340 Smith Avenue, Suite 200
Baltimore, MD 21209
- 5. Timothy M. Mallon, MD, MPH, MS**
6508 Folded Leaf Square
Columbia, MD 21044

NON-HODGKIN LYMPHOMA

Track 1 Trial Plaintiffs for Non-Hodgkin Lymphoma, namely Plaintiffs Frances Carter (on behalf of decedent Ronald Carter), Cometto J. Davis, Scott Richard Keller, Robert Arnold Kidd, Sr., and Jose Antonio Vidana, hereby designate the following experts who may be called upon to offer opinion testimony on the subject of general causation and Non-Hodgkin Lymphoma:

- 1. Steven B. Bird, MD**
6 Laurel Ridge Lane
Shrewsbury, MA 01545
- 2. Dean W. Felsher, MD, PhD**
Stanford University School of Medicine
Center for Clinical Sciences Research (CCSR) Building
269 Campus Drive
Stanford, CA 94305-5151
- 3. Kathleen M. Gilbert, PhD**
240 West 75th Street, Apt. 1B
New York, NY 10023

4. Howard Hu, MD, MPH, ScD

Dept of Population and Public Health Sciences
Keck School of Medicine of USC
Soto Street Building, Room 225D
1845 N Soto Street
Los Angeles, CA 90089-9239

PARKINSON'S DISEASE

Track 1 Trial Plaintiffs for Parkinson's Disease, namely Plaintiffs Gary McElhiney, Edgar Peterson, Diane Rothchild, Richard Sparks, and Robert Welch, hereby designate the following experts who may be called upon to offer opinion testimony on the subject of general causation and Parkinson's Disease:

1. Steven B. Bird, MD

6 Laurel Ridge Lane
Shrewsbury, MA 01545

2. Amelia K. Boehme, PhD, MSPH, FAHA

The Neurological Institute
710 W. 168th St., Room 641
New York, NY 10032

3. Jason Cannon, PhD

Purdue University - Hall for Discovery and Learning Research
207 S. Martin Jischke Dr
West Lafayette, IN 47907, USA

4. Lucio Costa, PharmD

4225 Roosevelt, Suite 100
Seattle, WA 98195

5. Briana DeMiranda, PhD

1720 2nd Ave South
Birmingham, AL 35294

6. Michael Freeman, MedDr, PhD, MScFMS, MPH, FRCPath, FFFLM, FACE, FRSPH, DLM

Forensic Research & Analysis
P.O. Box 96309
Portland, OR 97296

7. Gary Miller, PhD
722 West 168th Street
New York, NY 10032

ALL TRACK 1 TRIAL PLAINTIFFS

All Track 1 Trial Plaintiffs hereby designate the following expert who may be called upon to offer opinion testimony on the subject of general causation and the historical use of the Marine Corps Base Camp Lejeune as it related to water consumption:

1. Kyle Longley, PhD
24536 Acadia Drive
Corona, CA 92883

CONCLUSION

Contemporaneously with this designation, Plaintiffs are serving reports for the above-named experts electronically via a JEFS file-share link and pursuant to the Stipulated Order Establishing Protocol for Document Collection and Production (Case Management Order No. 8) (D.E. 52). The said reports set forth each expert's qualifications, opinions, fee schedule, and a list of all other cases in which, during the previous 4 years, the witness testified as an expert, as required by Fed. R. Civ. P. 26(a)(2)(B). Any facts and data considered by the above-named experts not already produced in this action and/or not readily available to the public will be produced within 7 days pursuant to the stipulated Order Regarding Expert Discovery (Case Management Order No. 17) (D.E. 305).

Plaintiffs make the above disclosures subject to the reservation of all rights allowed by the Federal Rules of Civil Procedure, Rules of Evidence, Local Rules, and applicable case law, including the right to supplement or amend this designation in order to address any opinions by Defendant United States of America's experts, the right to offer amended and/or supplemental opinions based on new records, testimony or information, the right to call any of the above experts

as a rebuttal or impeachment witness at trial, and the right to call any expert witness designated or identified by Defendant United States of America.

This the 9th day of December, 2024.

BELL LEGAL GROUP, LLC

By: /s/ J. Edward Bell, III
J. Edward Bell, III (admitted *pro hac vice*)
219 Ridge St.
Georgetown, S.C. 29440
Telephone: (843) 546-2408
jeb@belllegalgroup.com

Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

This is to certify that on the below-indicated date, I served a copy of the foregoing document upon counsel for Defendant United States of America by electronic mail at the following email address: adam.bain@usdoj.gov.

This the 9th day of December, 2024.

BELL LEGAL GROUP, LLC

By: /s/ J. Edward Bell, III
J. Edward Bell, III (admitted *pro hac vice*)
219 Ridge St.
Georgetown, S.C. 29440
Telephone: (843) 546-2408
jeb@belllegalgroup.com

Lead Counsel for Plaintiffs