

Exhibit 65

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 AMENDED DISCLOSURE OF PHASE II
REBUTTAL 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 additional Phase II rebuttal expert witnesses who may be called to offer rebuttal 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 rebuttal opinion testimony on the subject of general causation and kidney cancer:

- 1. David A. Savitz, Ph.D.**
Brown University
121 South Main Street, Box G-S121
Providence, RI 02912

- 2. David Madigan, Ph.D.**
27 Colchester Street
Brookline, MA 02446

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 rebuttal opinion testimony on the subject of general causation and leukemia:

1. **David A. Savitz, Ph.D.**
Brown University
121 South Main Street, Box G-S121
Providence, RI 02912

2. **David Madigan, Ph.D.**
27 Colchester Street
Brookline, MA 02446

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 rebuttal opinion testimony on the subject of general causation and Non-Hodgkin Lymphoma:

1. **David A. Savitz, Ph.D.**
Brown University
121 South Main Street, Box G-S121
Providence, RI 02912

2. **David Madigan, Ph.D.**
27 Colchester Street
Brookline, MA 02446

BLADDER CANCER

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

1. **David A. Savitz, Ph.D.**
Brown University

121 South Main Street, Box G-S121
Providence, RI 02912

- 2. David Madigan, Ph.D.**
27 Colchester Street
Brookline, MA 02446

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 rebuttal opinion testimony on the subject of general causation and Parkinson's Disease:

- 1. Jason Cannon, Ph.D.**
Purdue University - Hall for Discovery and Learning Research
207 S. Martin Jischke Dr.
West Lafayette, IN 47907
- 2. David A. Savitz, Ph.D.**
Brown University
121 South Main Street, Box G-S121
Providence, RI 02912
- 3. David Madigan, Ph.D.**
27 Colchester Street
Brookline, MA 02446

ALL TRACK 1 TRIAL PLAINTIFFS

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

- 1. Kyle Longley, Ph.D.**
24536 Acadia Drive
Corona, CA 92883

CONCLUSION

Rebuttal reports for Dr. Savitz and Dr. Madigan were previously served on March 17, 2025 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). At the time of service of such reports, Dr. Savitz and Dr. Madigan were designated as rebuttal experts for Plaintiffs in kidney cancer, leukemia and non-Hodgkin lymphoma but inadvertently not identified as rebuttal experts for Plaintiffs in bladder cancer and Parkinson's disease. Dr. Savitz and Dr. Madigan are now correctly identified as rebuttal experts for all Track 1 Trial Plaintiffs. The reports of Dr. Savitz and Dr. Madigan are the same across all five diseases and were previously served 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). Unless otherwise previously provided, 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).

Plaintiffs make the above amended 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 15th day of April, 2025.

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

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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 15th day of April, 2025.

BELL LEGAL GROUP, LLC

By: /s/ J. Edward Bell, III
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Lead Counsel for Plaintiffs

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