

Exhibit 66

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

**THE UNITED STATES’
DISCLOSURE OF EXPERT
TESTIMONY FOR PHASE II
PURSUANT TO FED. R. CIV. P.
26(a)(2)**

Pursuant to Fed. R. Civ. P. 26(a)(2) and the Court’s January 2, 2025 Order Amending Pretrial Scheduling [D.E. 312], the United States, through its attorneys, hereby discloses the following witnesses who are retained or specially employed to provide expert testimony in this case under Fed. R. Civ. P. 26(a)(2)(B), and who will provide opinions and testimony consistent

with those set forth in their expert reports:

BLADDER CANCER

The United States hereby discloses the following experts who may be called upon to offer expert opinion testimony in all Track 1 Trial Cases alleging bladder cancer:

1. **Jay Brigham, Ph.D.**
2. **Ari Kelman, Ph.D.**
3. **Julie Goodman, Ph.D., DABT, FACE, FATS**
4. **John C. Lipscomb, Ph.D., DABT, FATS**
5. **Peter G. Shields, M.D.**
6. **Michael J. McCabe, Jr., Ph.D.**

KIDNEY CANCER

The United States hereby discloses the following experts who may be called upon to offer expert opinion testimony in all Track 1 Trial Cases alleging kidney cancer:

1. **Jay Brigham, Ph.D.**
2. **Ari Kelman, Ph.D.**
3. **Julie Goodman, Ph.D., DABT, FACE, FATS**
4. **John C. Lipscomb, Ph.D., DABT, FATS**
5. **Peter G. Shields, M.D.**
6. **Michael J. McCabe, Jr., Ph.D.**

LEUKEMIA

The United States hereby discloses the following experts who may be called upon to offer expert opinion testimony in all Track 1 Trial Cases alleging leukemia:

1. **Jay Brigham, Ph.D.**
2. **Ari Kelman, Ph.D.**
3. **Julie Goodman, Ph.D., DABT, FACE, FATS**
4. **John C. Lipscomb, Ph.D., DABT, FATS**
5. **Peter G. Shields, M.D.**
6. **Michael J. McCabe, Jr., Ph.D.**

NON-HODGKIN'S LYMPHOMA

The United States hereby discloses the following experts who may be called upon to offer expert opinion testimony in all Track 1 Trial Cases alleging non-Hodgkin's lymphoma:

1. **Jay Brigham, Ph.D.**
2. **Ari Kelman, Ph.D.**
3. **Julie Goodman, Ph.D., DABT, FACE, FATS**
4. **John C. Lipscomb, Ph.D., DABT, FATS**
5. **Peter G. Shields, M.D.**
6. **Michael J. McCabe, Jr., Ph.D.**

PARKINSON'S DISEASE

The United States hereby discloses the following experts who may be called upon to offer expert opinion testimony in all Track 1 Trial Cases alleging Parkinson's Disease:

1. **Jay Brigham, Ph.D.**
2. **Ari Kelman, Ph.D.**
3. **Julie Goodman, Ph.D., DABT, FACE, FATS**
4. **John C. Lipscomb, Ph.D., DABT, FATS**

On this date, the United States is serving reports for each of the above listed experts in compliance with Fed. R. Civ. P. 26(a)(2)(B) and this Court's Scheduling Order. The reports are being served upon the Plaintiffs' Leadership Group through the U.S. Department of Justice's Enterprise File Sharing System (JEFS).

Further, pursuant to Fed. R. Civ. P. 26(a)(2)(C), the United States also discloses the following witnesses in all cases in the above captioned matter, including all Track 1 Trial Cases, who may provide testimony under Fed. R. Evid. 702, 703, or 705, but are not required to provide a written report. Under Fed. R. Civ. P. 26(a)(2)(C), the United States now provides a description

of the subject matter on which the witness may provide testimony under Fed. R. Evid. 702, 703, or 705 and a summary of the facts and opinions to which the witness may testify at trial.

1. **Frank Bove, Ph.D.** The United States intends to designate all of, or portions of, Dr. Bove's deposition testimony given on October 17 and 18, 2024 for use at trial or hearing. The United States does not intend to call Dr. Bove to testify live at trial or hearing. Dr. Bove, a former senior epidemiologist at ATSDR, testified during his deposition as to, *inter alia*, the subject matter, methodology, and execution of numerous health studies, assessments, and reports he authored or co-authored, addressing potential adverse health effects from exposure to drinking water at Marine Corps Base Camp Lejeune.
2. **David A. Savitz, Ph.D.** The United States intends to designate all of, or portions of, Dr. Savitz's deposition testimony given on June 10, 2024 and July 17, 2024 for use at trial or hearing. The United States does not intend to call Dr. Savitz to testify live at trial or hearing. Dr. Savitz, an epidemiologist and former chairman of the National Research Council's (NRC) committee evaluating Camp Lejeune's water contamination, offered testimony during his deposition regarding, *inter alia*, the subject matter of the "Contaminated Water Supplies at Camp Lejeune; Assessing Potential Health Effects (2009)," written by the NRC's Committee on Contaminated Drinking Water at Camp Lejeune.

The United States reserves the right to elicit opinions from experts disclosed by any other party in this litigation.

Dated: February 7, 2025

Respectfully submitted,

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Civil Division

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BRIDGET BAILEY LIPSCOMB
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/s/ Adam Bain
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CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2025, the foregoing was served on counsel of record via electronic mail.

/s/ Adam Bain

ADAM BAIN

Special Litigation Counsel, Torts Branch

Environmental Torts Litigation

U.S. Department of Justice