

Exhibit 327

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 III 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 III rebuttal expert witnesses who may be called to offer opinion testimony on the subject of specific causation, damages, and/or other expert disciplines not covered by an earlier phase concerning the Track 1 illnesses (collectively, "Residual Experts"):

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 retained experts who are providing written reports and may be called upon to offer opinion testimony as Residual Experts:

1. **Richard John Schuhmann, Ph.D.**
15 Ox Plow Lane
Kennebunkport, Maine, 04046
(For all Track 1 Trial Plaintiffs for Kidney Cancer)
2. **Irving C. Allen, MBA, PhD**
3981 Buck Mountain Ridge
Blacksburg, VA 24060
(For Plaintiff Tukes)
3. **Yair Lotan, MD**
2001 Inwood WCB3 4th floor
Dallas, TX 75390-9110
(For Plaintiffs Downs and Fancher)
4. **Joseph J. Del Pizzo, MD**
525 East 68 Street, Starr 946
New York, NY 10065
(For Plaintiffs Fancher and Mousser)

5. **Armine K. Smith, MD**
5215 Loughboro Road Northwest, Suite 150
Washington, DC 20016
(For Plaintiffs Howard and Tukes)

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 retained experts who are providing written reports and may be called upon to offer opinion testimony as Residual Experts:

1. **Richard John Schuhmann, Ph.D.**
15 Ox Plow Lane
Kennebunkport, Maine, 04046
2. **John P. Sfakianos, MD**
Professor, Urologic Oncology
Department of Urology, Icahn School of Medicine at Mount Sinai
5 East 98th street, 6th floor
New York, New York 10029-6574
3. **Thomas Longo, MD**
Associated Urologists of North Carolina, PA
160 MacGregor Pines Drive
Cary, NC 27511

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 retained expert who is providing written reports and may be called upon to offer opinion testimony as a Residual Expert:

1. **Richard John Schuhmann, Ph.D.**
15 Ox Plow Lane
Kennebunkport, Maine, 04046

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 retained experts who are providing written reports and may be called upon to offer opinion testimony as Residual Experts:

1. **Richard John Schuhmann, Ph.D.**
15 Ox Plow Lane
Kennebunkport, Maine, 04046

2. **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

CONCLUSION

Contemporaneously with this designation, Plaintiffs are serving rebuttal 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). 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). 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 14th day of May, 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
Telephone: (843) 546-2408
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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 14th day of May, 2025.

BELL LEGAL GROUP, LLC

By: /s/ J. Edward Bell, III
J. Edward Bell, III (admitted *pro hac vice*)
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Georgetown, S.C. 29440
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Lead Counsel for Plaintiffs