

Exhibit 348

**February 2025 Expert Report of Dr. Thomas Longo
[Bladder Cancer – Jefferson Criswell]**

Materials Considered List

1. All materials identified and cited in my Report of February 7, 2025
2. Camp Lejeune Justice Act of 2022, Pub. L. No. 117–168, title VIII, § 804 (2022)
3. Plaintiffs' Master Complaint dated October 6, 2023, In re Camp Lejeune Water Litigation, No. 7:23-cv-897 (EDNC)
4. Amended Short Form Complaint – Jefferson Mike Criswell.
5. Discovery Pool Profile Form-Jefferson Criswell.
6. Declaration of Jefferson Criswell February 3, 2025.
7. Deposition of Jefferson Criswell Dated March 12, 2024 and accompanying exhibits
8. Deposition of Jefferson Criswell Dated April 19, 2024 and accompanying exhibits
9. Deposition of Deana Criswell Dated August 6, 2024 and accompanying exhibits
10. Deposition of Scott Shelfo, MD., Dated May 1, 2024 and accompanying exhibits
11. Defendant United States of America's Second Supplemental Response to Plaintiff's Leadership Group's First Set of Interrogatories to Defendant United States of America Concerning Track 1 Discovery Pool Plaintiffs
12. General causation expert report of Dr. Steven Bird dated December 9, 2024
13. General causation expert report of Dr. Benjamin Hatten dated December 9, 2024
14. General causation expert report of Dr. Kathleen Gilbert dated December 9, 2024
15. General causation expert report of Dr. Laura Plunkett dated December 9, 2024
16. General causation expert report of Dr. Stephen Culp dated December 9, 2024

17. Expert Report of Morris L. Maslia, PE, DWRE, DEE, Fellow EWRI dated October 25, 2024, including Appendices H1, J, and K
18. Supplemental Report on Camp Lejeune Water Contamination and EPA Ban of TCE and PCE by Dr. Steven Bird dated February 4, 2025
19. Supplemental Expert Reports for Plaintiff Jefferson Criswell from Dr. Steven Bird and Dr. Benjamin Hatten.
20. Exposure Charts of Dr. Kelly Reynolds, MSPH, PhD: Criswell model cumulative and exposure data
21. 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)
22. Medical Records for Jefferson Michael Criswell
 - a. 01482_CRISWELL_0000000001-1189
 - b. 01482_CRISWELL_0000001309-1315
 - c. 01482_CRISWELL_0000001350
 - d. 01482_CRISWELL_0000001718-1850
 - e. 01482_CRISWELL_0000001851-1958
 - f. 01482_CRISWELL_0000004329-4672
 - g. 01482_CRISWELL_0000004974-4977
 - h. 01482_CRISWELL_MEDRECS_0000000001-511
 - i. 01482_CRISWELL_MEDRECS_0000000512
 - j. 01482_CRISWELL_MEDRECS_0000000513-514
 - k. 01482_CRISWELL_MEDRECS_0000000515-518
 - l. 01482_CRISWELL_MEDRECS_0000000519-521
 - m. 01482_CRISWELL_VBA_0000000247-249
 - n. 01482_CRISWELL_VBA_0000001841-1843
 - o. 01482_CRISWELL_VBA_0000001879-1885
 - p. 01482_CRISWELL_VBA_0000002055-2059
 - q. 01482_CRISWELL_VBA_0000002098-2105
 - r. 01482_CRISWELL_VBA_0000002264-2279
 - s. 01482_CRISWELL_VBA_0000002285-2294
 - t. 01482_CRISWELL_VBA_0000002361-2504

- u. 01482_CRISWELL_VBA_0000002651-2655
- v. 01482_CRISWELL_VBA_0000002656-2790
- w. 01482_CRISWELL_VBA_0000002792-2795
- x. 01482_CRISWELL_VBA_0000002798-2800
- y. 01482_CRISWELL_VBA_0000002810-3064
- z. 01482_CRISWELL_VBA_0000003129-3351
- aa. 01482_CRISWELL_VBA_0000003371-3521
- bb. 01482_CRISWELL_VBA_0000003555-2556
- cc. 01482_CRISWELL_VHA_0000000001-588

23. Agency for Toxic Substances and Disease Registry. Assessment of the Evidence for the Drinking Water Contaminants at Camp Lejeune and Specific Cancers and Other Diseases. January 13, 2017.

24. Agency for Toxic Substances and Disease Registry. Public Health Assessment for Camp Lejeune Drinking Water US Marine Corps Base Camp Lejeune, North Carolina. January 20, 2017.

25. Agency for Toxic Substances and Disease Registry. Morbidity Study of Former Marines, Employees, and Dependents Potentially Exposed to Contaminated Drinking Water at U.S. Marine Corps Base Camp Lejeune. April 2018.

26. Aschengrau A, Ozonoff D, Paulu C, Coogan P, Vezina R, Heeren T, Zhang Y. Cancer risk and tetrachloroethylene-contaminated drinking water in Massachusetts. *Arch Environ Health*. 1993 Sep-Oct;48(5):284-92.

27. Blair, A., Hartge, P., Stewart, P. A., McAdams, M., & Lubin, J. (1998). Mortality and cancer incidence of aircraft maintenance workers exposed to trichloroethylene and other organic solvents and chemicals: extended follow up. *Occup Environ Med*, 55(3), 161-171. doi:10.1136/oem.55.3.161

28. Blair, A., Petralia, S. A., & Stewart, P. A. (2003). Extended mortality follow-up of a cohort of dry cleaners. *Annals of epidemiology*, 13(1), 50-56.

29. Boice, J. D., Jr., Marano, D. E., Cohen, S. S., Mumma, M. T., Blot, W. J., Brill, A. B., . . . McLaughlin, J. K. (2006). Mortality among Rocketdyne workers who tested rocket engines, 1948-1999. *J Occup Environ Med*, 48(10), 1070-1092. doi:10.1097/01.jom.0000240661.33413.b5

30. Bove FJ. Evaluation of cancer incidence among Marines and Navy personnel and civilian workers exposed to contaminated drinking water at USMC Base Camp Lejeune: a cohort study. medRxiv preprint. January 29, 2024.
31. Bove FJ, Greek A, Gatiba R, Boehm RC, Mohnsen MM. Evaluation of mortality among Marines, Navy personnel, and civilian workers exposed to contaminated drinking water at USMC base Camp Lejeune: a cohort study. Environ Health. 2024 Jul 3;23(1):61.
32. Bove FJ, Ruckart PZ, Maslia M, Larson TC. Evaluation of mortality among marines and navy personnel exposed to contaminated drinking water at USMC base Camp Lejeune: a retrospective cohort study. Environ Health. 2014 Feb 19;13(1):10.
33. Bove FJ, Ruckart PZ, Maslia M, Larson TC. Mortality study of civilian employees exposed to contaminated drinking water at USMC Base Camp Lejeune: a retrospective cohort study. Environ Health. 2014 Aug 13;13:68.
34. Calvert, G. M., Ruder, A. M., & Petersen, M. R. (2011). Mortality and end-stage renal disease incidence among dry cleaning workers. *Occupational and environmental medicine*, 68(10), 709-716.
35. Christensen, K. Y., Vizcaya, D., Richardson, H., Lavoué, J., Aronson, K., & Siemiatycki, J. (2013). Risk of selected cancers due to occupational exposure to chlorinated solvents in a case-control study in Montreal. *Journal of occupational and environmental medicine*, 55(2), 198-208.
36. Hadkhale, K., Martinsen, J. I., Weiderpass, E., Kjaerheim, K., Lynge, E., Sparén, P., ... & Pukkala, E. (2016). Occupation and risk of bladder cancer in Nordic countries. *Journal of occupational and environmental medicine*, 58(8), e301-e307.
37. Hansen, J., Sallmen, M., Selden, A. I., Anttila, A., Pukkala, E., Andersson, K., . . . McLaughlin, J. K. (2013). Risk of cancer among workers exposed to trichloroethylene: analysis of three Nordic cohort studies. *J Natl Cancer Inst*, 105(12), 869-877. doi:10.1093/jnci/djt107
38. IARC Working Group on the Evaluation of Carcinogenic Risks to Humans. Trichloroethylene, Tetrachloroethylene, and Some Other Chlorinated Agents. Lyon (FR): International Agency for Research on Cancer; 2014. (IARC Monographs on the

Evaluation of Carcinogenic Risks to Humans, No. 106.) Available from:
<https://www.ncbi.nlm.nih.gov/books/NBK294281/>

39. Lipworth, L., Sonderman, J. S., Mumma, M. T., Tarone, R. E., Marano, D. E., Boice Jr, J. D., & McLaughlin, J. K. (2011). Cancer mortality among aircraft manufacturing workers: an extended follow-up. *Journal of occupational and environmental medicine*, 992-1007.
40. Lynge, E., Andersen, A., Rylander, L., Tinnerberg, H., Lindbohm, M. L., Pukkala, E., ... & Johansen, K. (2006). Cancer in persons working in dry cleaning in the Nordic countries. *Environmental Health Perspectives*, 114(2), 213-219.
41. Morgan, R. W., Kelsh, M. A., Zhao, K., & Heringer, S. (1998). Mortality of aerospace workers exposed to trichloroethylene. *Epidemiology*, 9(4), 424-431. Retrieved from <https://www.ncbi.nlm.nih.gov/pubmed/9647907>
42. Pesch, B., Haerting, J., Ranft, U., Klimpel, A., Oelschlägel, B., & Schill, W. (2000). Occupational risk factors for urothelial carcinoma: agent-specific results from a case-control study in Germany. *International Journal of epidemiology*, 29(2), 238-247.
43. Raaschou-Nielsen, O., Hansen, J., McLaughlin, J. K., Kolstad, H., Christensen, J. M., Tarone, R. E., & Olsen, J. H. (2003). Cancer risk among workers at Danish companies using trichloroethylene: a cohort study. *Am J Epidemiol*, 158(12), 1182-1192. doi:10.1093/aje/kwg282
44. Radican, L., Blair, A., Stewart, P., & Wartenberg, D. (2008). Mortality of aircraft maintenance workers exposed to trichloroethylene and other hydrocarbons and chemicals: extended follow up. *Journal of occupational and environmental medicine/American College of Occupational and Environmental Medicine*, 50(11), 1306.
45. Sciannameo, V., Carta, A., d'Errico, A., Giraudo, M. T., Fasanelli, F., Arici, C., . . . Ricceri, F. (2019). New insights on occupational exposure and bladder cancer risk: a pooled analysis of two Italian case-control studies. *Int Arch Occup Environ Health*, 92(3), 347-359. doi:10.1007/s00420-018-1388-2
46. Seldén, A. I., & Ahlborg, G. (2011). Cancer morbidity in Swedish dry-cleaners and laundry workers: historically prospective cohort study. *International archives of occupational and environmental health*, 84, 435-443.

47. Spirtas, R., Stewart, P. A., Lee, J. S., Marano, D. E., Forbes, C. D., Grauman, D. J., . . . Cohen, J. L. (1991). Retrospective cohort mortality study of workers at an aircraft maintenance facility. I. Epidemiological results. *Br J Ind Med*, 48(8), 515-530. doi:10.1136/oem.48.8.515

48. U.S. EPA (U.S. Environmental Protection Agency). Tetrachloroethylene (Perchloroethylene) (CASRN: 127-18-4). 2012b. Available: <http://www.epa.gov/iris/toxreviews/0106tr.pdf>

49. Vlaanderen, J., Straif, K., Ruder, A., Blair, A., Hansen, J., Lynge, E., . . . & Guha, N. (2014). Tetrachloroethylene exposure and bladder cancer risk: a meta-analysis of dry-cleaning-worker studies. *Environmental Health Perspectives*, 122(7), 661-666.

50. Xie S, Friesen MC, Baris D, Schwenn M, Rothman N, Johnson A, Karagas MR, Silverman DT, Koutros S. Occupational exposure to organic solvents and risk of bladder cancer. *J Expo Sci Environ Epidemiol*. 2024 May;34(3):546-553.

51. Zhao, Y., Krishnadasan, A., Kennedy, N., Morgenstern, H., & Ritz, B. (2005). Estimated effects of solvents and mineral oils on cancer incidence and mortality in a cohort of aerospace workers. *Am J Ind Med*, 48(4), 249-258. doi:10.1002/ajim.20216

Dr. Longo reserves the right: to review and consider additional facts, data and publications; to consider the report of any other witness in this action; the right to supplement this Materials Considered List; and the right to consider the report of any other witness in this action.