

Exhibit 380

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:)	Case Nos.:
)	
ALL CASES)	7:23-CV-897
)	
DAVID DOWNS)	7:23-CV-01145-BO
)	
DAVID WILLIAM FANCHER)	7:23-CV-00275-BO-BM
)	
ALLAN WAYNE HOWARD)	7:23-CV-00490-BO
)	
FRANK W. MOUSSER)	7:23-CV-00667-BO-RN
)	
JACQUELINE JORDAN TUKES)	7:23-CV-01553-BO-BM

**PLAINTIFFS' DESIGNATION AND DISCLOSURE OF PHASE III EXPERT
WITNESSES WITH RESPECT TO KIDNEY CANCER**

**MATERIALS CONSIDERED LIST FOR IRVING C. ALLEN'S REPORT ON
PLAINTIFF JACQUELINE J. TUKES**

Pursuant to Fed. R. Civ. P. 26(a)(2)(B)(ii) and the Stipulated Order Regarding Expert Discovery (Case Management Order No. 17) (D.E. 305), Plaintiffs hereby identify the facts, data, and publications considered by Irving C. Allen, MS, MBA, PhD ("Dr. Allen") in forming his opinions set forth in his report concerning Plaintiff Jaqueline J. Tukes served on February 7, 2025 (the "Report").

Dr. Allen's Report contains a thorough statement of the facts, data, and publications that he considered in forming his opinions, including sections entitled "Reliance List" and "References." Plaintiffs incorporate all facts, data, and publications referenced in Dr. Allen's Report as if fully listed herein. Unless otherwise stated below, any facts, data or publications cited in Dr. Allen's

Report are either publicly accessible or were previously produced to the government by Plaintiffs. Plaintiffs specifically identify the following facts, data, and publications considered by Dr. Allen in forming his opinions for Jaqueline J. Tukes:

1. Medical Records of Jaqueline J. Tukes bearing bates numbers 01553_TUKES_0000000432-717;

2. Dr. Allen reserves the right to review and consider additional facts, data and publications;

3. Dr. Allen reserves the right to consider the report of any other witness in this action; and

4. Dr. Allen reserves the right to supplement this Materials Considered List.