

Exhibit 405

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 TIMOTHY M. MALLON'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 Timothy M. Mallon, MD, MPH, MS ("Dr. Mallon") in forming his opinions set forth in his report concerning Plaintiff Jaqueline J. Tukes served on February 7, 2025 (the "Report").

Dr. Mallon's Report contains a thorough statement of the facts, data, and publications that he considered in forming his opinions, including a section entitled "References Consulted." Plaintiffs incorporate all facts, data, and publications referenced in Dr. Mallon's Report as if fully listed herein. Unless otherwise stated below, any facts, data or publications cited in Dr. Mallon'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. Mallon in forming his opinions for Jaqueline J. Tukes:

1. Plaintiff Jaqueline J. Tukes Second Amended Short-Form Complaint;
2. November 26, 2024 Declaration of Jaqueline J. Tukes, produced contemporaneously with the present Materials Considered List;
3. January 30, 2025 Declaration of Jaqueline J. Tukes, produced contemporaneously with the present Materials Considered List;
4. Transcripts of the depositions of Plaintiff Jaqueline J. Tukes (April 11, 2024 and January 15, 2025), Nagesh H. Jayaram, MD, Roc McCarthy, DO, Heather Jones, MD, Mary Katherine Garbarini, MS, CGC, and all documents marked as exhibits therein;
5. Transcripts of the depositions of Willie Tukes, Jr. and K.V. George Thomas, MD;
6. Defendant United States of America's Second Supplemental Response to Plaintiffs' Leadership Group's First Set of Interrogatories to Defendant United States of America Concerning Track 1 Discovery Pool Plaintiffs – Jaqueline J. Tukes (July 11, 2024);
7. Defendant United States of America's Third Supplemental Response to Plaintiff's Leadership Group's First Set of Interrogatories to Defendant United States of America Concerning Track 1 Discovery Pool Plaintiffs – Jaqueline J. Tukes (September 3, 2024);
8. Discovery Pool Profile Form for Jaqueline J. Tukes (bates number 01553_DOWNS_DPPF_0000000001-0000000015);
9. Dr. Irving C. Allen, MS, MBA, PhD, Expert Report on the Review of Genetic Testing Records for Jaqueline Tukes – Renal Cell Carcinoma;
10. Jaqueline J. Tukes Exposure Profile/Chart, produced contemporaneously herewith;

11. Jaqueline J. Tukes Military and/or Housing Records (01553_TUKES_0000000008);
12. Appendices H1, J, and K to the Expert Report of Morris L. Maslia, PE, DWRE, DEE, Fellow EWRI;
13. Jaqueline J. Tukes Medical Records as set forth in Exhibit A hereto;
14. Jaqueline J. Tukes' Medical Expenses (bates numbers 01553_TUKES_DVKC_0000000145-00000005058);
15. All materials considered during the preparation of Dr. Mallon's General Causation Report on Kidney Cancer served previously in the present litigation;
16. All facts and data listed herein are either identified by bates number or are otherwise accessible by Defendant United States of America;
17. Dr. Mallon reserves the right to review and consider additional facts, data and publications;
18. Dr. Mallon reserves the right to consider the report of any other witness in this action; and
19. Dr. Mallon reserves the right to supplement this Materials Considered List.

EXHIBIT A

Medical Record Bates Number Ranges
01553_TUKES_0000000010-147
01553_TUKES_0000000148-199
01553_TUKES_0000000200-247
01553_TUKES_0000000248-258
01553_TUKES_0000000259-329
01553_TUKES_0000000330-338
01553_TUKES_0000000339-403
01553_TUKES_0000000404-431
01553_TUKES_0000000432-717
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01553_TUKES_NH_0000000001-590

01553_TUKES_NH_0000000591-850
01553_TUKES_SMO_0000000001-96
01553_TUKES_SMO_0000000097-99