

# Exhibit 409

**ERRATA – Expert Reports of Timothy M. Mallon, M.D., M.P.H., MS.**

**Downs Report:**

1. P. 11 of the Report currently reads: “Mr. Downs had TCE exposure at Tarawa Terrace that ranged from 1-3 ug/L-months and this totaled 43 ug/L-months over the 19 months at Tarawa Terrace.”
  - a. Errata: “1-3 ug/L-months” should read “1-3 ug/L” to be consistent with the report and Dr. Reynolds’ charts.
2. P. 11 of the Report currently reads: “Mr. Downs also had 9 to 19 ug/Lmonths of TCE exposure at Hadnot Point which totaled 282 ug/L-months cumulative exposure while at Hadnot Point for 19 months.”
  - a. Errata: “9 to 19 ug/Lmonths” should read “9 to 19 ug/L” to be consistent with the report and Dr. Reynolds’ charts.
3. P. 12 of the Report currently reads: “Mr. Downs had exposure to the following concentrations in the water during his time at Camp Lejeune in his 589 days on base: 43 microgram/liters TCE, 939 microgram/liter PCE and 122 microgram/liter vinyl chloride at Tarawa Terrace.”
  - a. Errata: “microgram/liters” should read “microgram/liter-months” to be consistent with the report and Dr. Reynolds’ charts.
4. P. 12 of the Report currently reads: “He was exposed to approximately 282 microgram/liter TCE at Hadnot Point.”
  - a. Errata: “microgram/liters” should read “microgram/liter-months” to be consistent with the report and Dr. Reynolds’ charts.
5. P. 17 of the Report currently reads: “Ingestion of thousands of ppb of TCE is a substantial exposure.”
  - a. Errata: “ppb” should read “micrograms” to be consistent with the report and Dr. Reynolds’ charts.
6. P. 17 of the Report currently reads: “This effect was amplified by the fact that according to Dr. Reynolds, Mr. Downs would have also ingested between 23,000 ppb and 59,000ppb of PCE.”
  - a. Errata: “ppb” should read “micrograms” to be consistent with the report and Dr. Reynolds’ charts.
7. P. 17 of the Report currently reads: “Importantly, this exposure is an underestimate of the cumulative ppb of chemicals that actually entered his body.”
  - a. Errata: “ppb” should read “micrograms” to be consistent with the report and Dr. Reynolds’ charts.
8. P. 19 of the Report currently reads: “Mr. Downs TCE exposure totaled between the two locations was 324 ug/L which was in the lower of the exposure ranges for the low exposure to TCE in Bove 2014a.”
  - a. Errata: “ug/L” should read “ug/L-months” to be consistent with the report and Dr. Reynolds’ charts.

**Tukes Report:**

1. P. 11 of the Report currently reads: “Using the TechFlow model and assuming the ingestion statistics in Ms. Tukes’ deposition, Ms. Tukes was exposed to 5,875 ppb of PCE through ingestion alone.”
  - a. Errata: “ppb” should read “micrograms” to be consistent with the report and Dr. Reynolds’ charts.
2. P. 16 of the Report currently reads: “Bove 2014a used a threshold between low and medium exposure of 45 ppb/L-months.”
  - a. Errata: “ppb/L-months” should read “ug/L-months” to be consistent with the Bove 2014a study.
3. P.16 of the Report currently reads: “The levels of TCE at Tarawa Terrace during that time were less than 1 ug/L-month.”
  - a. Errata: “ug/L-month” should read “ug/L” to be consistent with the report and Dr. Reynolds’ charts.

Signed by:

*Timothy Mallon, MD*

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Timothy M. Mallon, M.D., M.P.H., M.S.