

# Exhibit 445

**ATTACHMENT B (FACTS AND DATA CONSIDERED)**

Contents

I. Expert Reports .....	2
A. PLG Experts.....	2
B. DOJ Experts .....	2
II. Depositions .....	3
A. Tukes.....	3
III. Other articles and literature.....	4
IV. Other documents produced in this litigation.....	5
A. Tukes.....	5
B. Other Documents Produced .....	7

**I. Expert Reports**

*A. PLG Experts*

*1. Phase 2*

1. Bird, Steven B., Phase 2 Expert Report (December 9, 2024)
2. Freeman, Michael D., Phase 2 Expert Report (December 8, 2024)
3. Gilbert, Kathleen M., Phase 2 Expert Report (December 9, 2024)
4. Hatten, Benjamin, Phase 2 Expert Report (December 8, 2024)
5. Mallon, Timothy M., Phase 2 Expert Report (December 9, 2024)
6. Reynolds, Kelly A., Phase 2 Expert Report (December 7, 2024)

*2. Phase 3 (Tukes)*

1. Allen, Irving C., Expert Report on the Review of Genetic Testing Records for Mrs. Jacqueline Tukes (February 7, 2025)
2. Cooper, Matthew, Specific Causation Expert Report for Mrs. Jacqueline Tukes (February 2, 2025)
3. Fryar, Michael A., Cost Analysis Tables for Mrs. Jacqueline Tukes (January 28, 2025)
4. Josephson, David Y., Specific Causation Expert Report for Mrs. Jacqueline Tukes (February 7, 2025)
5. Mallon, Timothy M., Specific Causation Expert Report for Mrs. Jacqueline Tukes (February 7, 2025)
6. Staller, Chad L., and Dripps, Stephen M., Economic Loss Expert Report for Mrs. Jacqueline Tukes (February 6, 2025)
7. Smith, Armine K., Specific Causation Expert Report for Mrs. Jacqueline Tukes (February 4, 2025)

*B. DOJ Experts*

*1. Phase 2*

1. Goodman, Julie E., Phase 2 Expert Report (February 7, 2025)
2. Lipscomb, John C., Phase 2 Expert Report (February 7, 2025)
3. Lipscomb, John C., Phase 2 Supplemental Expert Report (February 28, 2025)
4. McCabe, Jr., Michael J., Phase 2 Expert Report (February 7, 2025)
5. Shields, Peter G., Phase 2 Expert Report (February 7, 2025)

*2. Phase 3 (Tukes)*

1. Bailey, Lisa, Phase 3 Expert Report in *Tukes v. United States* (April 8, 2025)
2. Johnstone, Duncan, Phase 3 Expert Report in *Tukes v. United States* (April 8, 2025)
3. LaKind, Judy, Phase 3 Expert Report in *Tukes v. United States* (April 8, 2025)
4. Shahnasarian, Michael, Phase 3 Expert Report in *Tukes v. United States* (April 8, 2025)
5. Stadler, Walter, Phase 3 Expert Report in *Tukes v. United States* (April 8, 2025)

## **II. Depositions**

1. Bove, FJ. "Videotaped & videoconferenced deposition of Dr. Frank J. Bove [re: Camp Lejeune Water Litigation re: All cases]." Submitted to US District Court, Eastern District of North Carolina, Southern Division. Case No. 7:23-cv-00897, October 17, 18, 2024.
2. Savitz, David. "Videotaped & videoconferenced deposition of Dr. David A. Savitz, Ph.D. [re: Camp Lejeune Water Litigation re: All cases]." Submitted to US District Court, Eastern District of North Carolina, Southern Division. Case No. 7:23-cv-00897, June 10, 17, 2024.

### *A. Tukes*

1. Tukes, Jacqueline J., "Videotaped and videoconferenced deposition of Jacqueline Jordan Tukes [re: Camp Lejeune Water Litigation re: All cases]." Submitted to US District Court, Eastern District of North Carolina, Southern Division. 7:23-cv-01553, April 11, 2024.
2. Tukes, Jacqueline J., "Videotaped and videoconferenced deposition of Jacqueline Jordan Tukes [re: Camp Lejeune Water Litigation re: All cases]." Submitted to US District Court, Eastern District of North Carolina, Southern Division. 7:23-cv-01553, January 15, 2025.
3. Tukes, Jr., Willie, "Video-recorded deposition of Willie Tukes, Jr. [re: Camp Lejeune Water Litigation re: All cases]." Submitted to US District Court, Eastern District of North Carolina, Southern Division. 7:23-cv-01553, January 15, 2025.
4. Garbarini, Mary K., "Remote videotaped videoconference deposition of Mary Katherine Garbarini, MS, CGC [re: Camp Lejeune Water Litigation re: All cases]." Submitted to US District Court, Eastern District of North Carolina, Southern Division. 7:23-cv-01553, June 20, 2024.
5. Jayaram, Nagesh H., "Oral videotaped deposition by Zoom of Nagesh H. Jayaram, M.D. [re: Camp Lejeune Water Litigation re: All cases]." Submitted to US District Court, Eastern District of North Carolina, Southern Division. 7:23-cv-01553, June 6, 2024.
6. Jones, Heather, "Remote videotaped videoconference deposition of Heather Jones, MD [re: Camp Lejeune Water Litigation re: All cases]." Submitted to US District Court, Eastern District of North Carolina, Southern Division. 7:23-cv-01553, August 5, 2024. Tukes, Jacqueline J., "Video-recorded deposition of Jacqueline Jordan Tukes [re: Camp Lejeune Water Litigation re: All cases]." Submitted to US District Court, Eastern District of North Carolina, Southern Division. 7:23-cv-01553, January 15, 2025.
7. McCarthy, Roc, "Remote videotaped and stenographic deposition of Roc McCarthy, DO [re: Camp Lejeune Water Litigation re: All cases]." Submitted to US District Court, Eastern District of North Carolina, Southern Division. 7:23-cv-01553, June 7, 2024.
8. Thomas, K. V. G., "Oral videotaped deposition by Zoom of K. V. George Thomas, M.D. [re: Camp Lejeune Water Litigation re: All cases]." Submitted to US District Court, Eastern District of North Carolina, Southern Division. 7:23-cv-01553, June 26, 2024.

### **III. Other articles and literature**

1. All materials identified or cited in my April 8, 2025 Report
2. Agency for Toxic Substances and Disease Registry (ATSDR). 2017a. "Public Health Assessment Camp Lejeune Drinking Water, U.S. Marine Corps Base Camp Lejeune, North Carolina." January 20, 2017.
3. Agency for Toxic Substances and Disease Registry (ATSDR). 2017b. "ATSDR Assessment of the Evidence for the Drinking Water Contaminants at Camp Lejeune and Specific Cancers and Other Diseases." January 13, 2017.
4. Agency for Toxic Substances and Disease Registry (ATSDR). 2018. "Morbidity Study of Former Marines, Employees, and Dependents Potentially Exposed to Contaminated Drinking Water at U.S. Marine Corps Base Camp Lejeune." April 2018.
5. Bove, FJ; Ruckart, PZ; Maslia, M; Larson, TC. 2014a. "Mortality study of civilian employees exposed to contaminated drinking water at USMC Base Camp Lejeune: A retrospective cohort study." *Environ. Health* 13:68. doi: 10.1186/1476-069X-13-68.
6. Bove, FJ; Ruckart, PZ; Maslia, M; Larson, TC. 2014b. "Evaluation of mortality among marines and navy personnel exposed to contaminated drinking water at USMC base Camp Lejeune: a retrospective cohort study." *Environ. Health* 13:10. doi:10.1186/1476-069X-13-10.
7. Bove, FJ; Greek, A; Gatiba, R; Boehm, RC; Mohnsen, MM. 2024a. "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* 23(1):61. doi: 10.1186/s12940-024-01099-7.
8. Bove, FJ. 2024b. "Evaluation of mortality among Marines, Navy personnel, and civilian workers exposed to contaminated drinking water at USMC Base Camp Lejeune: A cohort study." *Res. Square* doi: 10.21203/rs.3.rs-4171975/v1.
9. Bove, FJ; Greek A; Gatiba, R; Kohler, B; Sherman, R; Shin, GT; Bernstein, A. 2024c. "Cancer incidence among Marines and Navy personnel and civilian workers exposed to industrial solvents in drinking water at US Marine Corps Base Camp Lejeune: A cohort study." *Environ. Health Perspect.* 132(10):107008. doi: 10.1289/EHP14966.
10. National Research Council (NRC). 2009. "Contaminated Water Supplies at Camp Lejeune: Assessing Potential Health Effects." National Academies Press, Washington, DC. 2009.

**IV. Other documents produced in this litigation**

*A. Tukes*

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*B. Other Documents Produced*

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