Exhibit 535

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.:
	)	
ROBERT WELCH	)	7:23-CV-01503
	)	
RICHARD SPARKS	)	7:23-CV-00682

MATERIALS CONSIDERED LIST FOR DR. HEIDI SCHWARZ'S REPORTS ON PLAINTIFFS ROBERT WELCH AND RICHARD SPARKS

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 Heidi Schwarz, MD, FAAN ("Schwarz") in forming her opinions set forth in her reports concerning Plaintiffs Robert Welch and Richard Sparks served on February 7, 2025 (the "Reports").

Schwarz's Reports contain a thorough statement of the facts, data, and publications that she considered in forming her opinions, including the section entitled "Exhibit A." Plaintiffs incorporate all facts, data, and publications referenced in Schwarz's Reports as if fully listed herein. Unless otherwise stated below, any facts, data or publications cited in Schwarz's Reports are either accessible to the government or were previously produced by Plaintiffs.

Plaintiffs specifically identify the following facts, data, and publications considered by Schwarz in forming her opinions for Robert Welch:

1. Gash DM; Bohn MC; Fiandaca MS; Okawara SH; Kordower JH; Notter MFD; Snyder J; **Schwarz HB**; Shoulson I. "Adrenal Medullary Implantation Promotes Tyrosine Hydroxylase Immunoreactivity in Host Striatum of MPTP Animal Models of Parkinsonism". Archives of Neurology. 1988; 45(7): 810-811

2. Cudkowicz, M. and (2010), A futility study of minocycline in Huntington's disease†. Mov. Disord., 25: 2219-2224. https://doi.org/10.1002/mds.23236

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5. Dorsey, ER et al. "National Randomized Controlled Trial of Virtual House Calls for People with Parkinson's Disease: Interest and Barriers". Telemedicine and e-Health. 2016;22 (7):590-598.

6. Dorsey, ER;: Wagner, JD; Bull, MT; Rizzieri, A; Grischkan, J; Achey, MA; Sherer, T; Chowdhury S; Meunier,C;Cappelletti, L; Rocher, C; Richard, IH; **Schwarz, H**; Kang, G; Ahmad, SH; Biemiller, RA; Biglan, KM. "Feasibility of Virtual Research Visits in Fox Trial Finder". Journal of Parkinson's Disease. 2015; 5: 505-515

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11. Antony, P. M., Diederich, N. J., Krüger, R. & Balling, R. The hallmarks of Parkinson's disease. Febs j280, 5981-5993 (2013). https://doi.org:10.1111/febs.12335

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59. General Causation Report by Briana De Miranda, PhD 12/8/2024

60. General Causation Report by Lucio Costa, PhD 12/6/2024

61. General Causation Report by Gary W. Miller, PhD 12/7/2024

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71. Deposition of Dr.Carolyn Neff MD on April 26, 2024

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75. Records of deposition from Maureen Ann Welch on May 20, 2024

76. Records of deposition from Robert E. Welch on March 8, 2024

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78. Records of deposition Jeffrey Tracy MD on August 8, 2024

79. Records of deposition Edward Markus DO on April 24, 2024

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81. ATSDR, CAMP LEJEUNE DRINKING WATER, U.S. MARINE CORPS BASE CAMP LEJEUNE, NORTH CAROLINA JANUARY 20, 2017

82. United States Supplemental Interrogatory Responses dated May 15, 2024

83. Bates Numbered Medical Records:
01503_WELCH_0000000001 – 0000000054
01503_WELCH_0000000055 – 0000000058
01503_WELCH_0000000081 – 0000000089
01503_WELCH_0000000263 – 0000000380
01503_WELCH_0000000382 – 0000002465
01503_WELCH_0000002466 – 0000004564
01503_WELCH_VBA_0000000104 – 0000000266
01503_WELCH_VBA_0000000288 – 0000000439
01503_WELCH_VBA_0000000632 – 0000000637
01503_WELCH_VBA_0000001262 – 0000001276
01503_WELCH_VHA_0000000001 – 0000000148
01503_WELCH_VHA_0000000171 - 0000000571

84. Bates Numbered Military Records:
01503_WELCH_0000000133 – 0000000138

Plaintiffs specifically identify the following facts, data, and publications considered by Schwarz in forming her opinions for Richard Sparks:

1. Gash DM; Bohn MC; Fiandaca MS; Okawara SH; Kordower JH; Notter MFD; Snyder J; **Schwarz HB**; Shoulson I. "Adrenal Medullary Implantation Promotes Tyrosine Hydroxylase Immunoreactivity in Host Striatum of MPTP Animal Models of Parkinsonism". Archives of Neurology. 1988; 45(7): 810-811

2. Cudkowicz, M. and (2010), A futility study of minocycline in Huntington's disease†. Mov. Disord., 25: 2219-2224. https://doi.org/10.1002/mds.23236

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5. Dorsey, ER et al. "National Randomized Contolled Trial of Virtual House Calls for People with Parkinson's Disease: Interest and Barriers". Telemedicine and e-Health. 2016;22 (7):590-598.

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63. General Causation Report by Lucio Costa, PhD 12/6/2024

64. General Causation Report by Gary W. Miller, PhD 12/7/2024

65. General Causation Report by Amelia Boehme, PhD, MSPH 12/8/2024

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77. United States Supplemental Interrogatory Responses dated May 15, 2024

78. Bates Numbered Medical Records:
00682_SPARKS_0000006599 – 0000006649
00682_SPARKS_0000006707 – 0000007196
00682_SPARKS_VBA_0000000021 – 0000000324
00682_SPARKS_VBA_0000001408 – 0000001415
00682_SPARKS_VBA_0000002464 – 0000002596
00682_SPARKS_VBA_0000002597 – 0000002629
00682_SPARKS_VBA_0000002870 – 0000002914
00682_SPARKS_VBA_0000003130 – 0000003131
00682_SPARKS_VBA_0000003218 – 0000003219
00682_SPARKS_VBA_0000003363 – 0000004012
00682_SPARKS_VBA_0000004687
00682_SPARKS_VBA_0000004752 – 0000004760
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00682_SPARKS_VBA_0000006126 – 0000006158
00682_SPARKS_VHA_0000000277 – 0000001054
00682_SPARKS_VHA_0000001055 – 0000001155
00682_SPARKS_VHA_0000001159 – 0000001169
00682_SPARKS_VHA_0000001195 – 0000001374

79. Bates Numbered Military Records:
00682_SPARKS_NARA_0000000001 – 0000000161

All facts and data listed herein are either identified by bates number or are publicly available to and accessible by Defendant United States of America.

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

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

Dr. Schwarz reserves the right to supplement this list of materials considered.