

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
Case No. 7:23-cv-897

IN RE:	)	
	)	
CAMP LEJEUNE WATER LITIGATION	)	AMENDED PRETRIAL ORDER
	)	
This Document Relates To:	)	
<i>Mousser v. United States</i> , No. 7:23-cv-00667	)	
	)	

Date of Conference: September 9, 2026

I. STIPULATIONS.

The parties stipulate and agree to the following:

A. Jurisdiction

1. This Court has subject matter jurisdiction under Section 804(d) of the Camp Lejeune Justice Act. Camp Lejeune Justice Act of 2022, Pub. L. No. 117-168, § 804(d), 136 Stat. 1759, 1803.
2. This Court is the appropriate venue for this matter under Section 804(d) of the Camp Lejeune Justice Act. Camp Lejeune Justice Act of 2022, Pub. L. No. 117-168, § 804(d), 136 Stat. 1759, 1803.

B. Joinder

1. There are no issues of misjoinder or nonjoinder of parties.

C. Capacity of the Parties

1. Plaintiff Frank Mousser has the capacity to sue in his individual capacity.
2. Defendant United States is the federal government with capacity to sue and be sued.

D. Plaintiff-Specific Stipulated Facts

1. Plaintiff is “[a]n individual . . . who resided, worked, or was otherwise exposed . . . for not less than 30 days during the period beginning on August 1, 1953, and ending on December 31, 1987, to water at Camp Lejeune, North Carolina, that was supplied by, or on behalf of, the United States” who is entitled to “bring an action in the United States District Court for the Eastern District of North Carolina to

obtain appropriate relief for harm that was caused by exposure to the water at Camp Lejeune.” Camp Lejeune Justice Act of 2022, Pub. L. No. 117-168, § 804(b), 136 Stat. 1759, 1803.

2. Plaintiff complied with section 2675 of title 28, United States Code, before bringing his or her action under the Camp Lejeune Justice Act, Pub. L. No. 117-168, title VIII § 804 (2022).
3. Plaintiff’s time at Camp Lejeune spanned from October 18, 1982 through September 7, 1986.
4. While deployed in November 1983, Plaintiff experienced hematuria, or visible blood in his urine. Plaintiff was not diagnosed with a malignancy at that time.
5. Plaintiff experienced hematuria again in September 2017.
6. Plaintiff’s medical providers found a 3.7cm mass on his right kidney on August 25, 2020.
7. Plaintiff underwent a right robotic assisted laparoscopic radical nephroureterectomy with bladder cuff and gemcitabine bladder installation on October 20, 2020.
8. Plaintiff was diagnosed with non-invasive high grade papillary urothelial carcinoma, or upper tract urothelial carcinoma (“UTUC”) in 2020.
9. Plaintiff was 57 years old at the time of diagnosis and surgery for UTUC.
10. Plaintiff was diagnosed with chronic kidney disease (“CKD”) after his October 20, 2020 nephroureterectomy.
11. Since January 2022, Plaintiff has been diagnosed with CKD Stage 3a A1.
12. On October 28, 2024, Plaintiff’s providers found a prostatic polyp on or around his bladder during a cystoscopy.
13. Plaintiff’s prostatic polyp was removed via cystoscopy on January 31, 2025.
14. Pathology results showed that the prostatic polyp was low-grade papillary urothelial cell carcinoma.
15. Plaintiff has not been diagnosed with another carcinoma since January 31, 2025.
16. Plaintiff’s medical treatment was reasonable and medically necessary.

E. Other Fact Stipulations

Plaintiff

1. Plaintiff is either an individual, including a veteran (as defined in section 101 of title 38, United States Code), or the legal representative of such an individual, who resided, worked, or was otherwise exposed (including in utero exposure) for not less than 30 days during the period beginning on August 1, 1953, and ending on December 31, 1987, to water at Camp Lejeune, North Carolina, that was supplied by, or on behalf of, the United States of America; and
2. Plaintiff complied with section 2675 of title 28, United States Code, before bringing his or her action under the Camp Lejeune Justice Act, Pub. L. No. 117–168, title VIII, § 804 (2022).

Camp Lejeune Background

3. Marine Corps Base Camp Lejeune (“Camp Lejeune”) is a military base operated by the United States, located outside of Jacksonville, in Onslow County, North Carolina. The base is located on the coast of the Atlantic Ocean, with approximately 11 miles of usable shoreline, and currently occupying approximately 156,000 acres (244 square miles) in total. (Compl. ¶ 2; Answer, ¶ 2; Brigham Dec. 9, 2024 Rep. at 3).
4. The United States owned, operated, and managed Camp Lejeune between August 1, 1953, and December 31, 1987, by and through the Navy and Marine Corps. (See Answer ¶ 20).
5. Between 1953 and 1987, the Camp Lejeune Military Reservation occupied an area of approximately 110,000 acres (including 2,772 acres that encompasses Marine Corps Air Station New River). (Longley Dec. 7, 2024 Rep. at 6; Brigham Dec. 9, 2024 Rep. at 3).
6. Nine water distribution systems supplied water at Camp Lejeune between 1953 and 1987: Hadnot Point, Tarawa Terrace, Holcomb Boulevard, Camp Geiger, Camp Johnson (also known as Montford Point), Courthouse Bay, Marine Corps Air Station New River, Onslow Beach, and Stone Bay Rifle Range (also known as Rifle Range). (See Compl. ¶ 23; Answer ¶ 23; Brigham Dec. 9, 2024 Rep. at 2; CLJA_WATERMODELING_01-0000190491).
7. The Hadnot Point Industrial Area and the Hadnot Point Landfill were the sources of contamination of groundwater wells connected to the Hadnot Point water treatment plant. (Brigham Rep. at 7, 42.)
8. ABC One-Hour Cleaners, located at 2127 Lejeune Boulevard (Highway 24), was the source of the tetrachloroethylene (or PCE) contamination at the Tarawa Terrace water treatment plant. (Brigham Rep. at 2, 25.)

9. The Marine Corps used 400-gallon water trailers to supply water for field training at Camp Lejeune during the statutory period. These water trailers were also known as “water buffaloes” or “water bulls.” (Brigham Rep. at 2, 97; Master Ans. at 23 ¶¶ 99-100.)

Development and Use of ATSDR’s Camp Lejeune Water Models

10. The Agency for Toxic Substances and Disease Registry (ATSDR) is a federal, non-regulatory public health agency codified in the Comprehensive Environmental Response, Compensation & Liability Act (CERCLA) of 1980, also known as Superfund (CERCLA 1980). 42 U.S.C. § 9604(i). (Maslia Rebuttal Rep. at p. 8.)
11. In 1980, Congress created ATSDR to implement the health-related sections of laws that protect the public from hazardous wastes and environmental spills of hazardous substances. (Maslia Rep. at 12.)
12. CERCLA states that “ATSDR shall perform a health assessment for each facility on the National Priorities List” 42 U.S.C. § 9604(i)(6)(A).
13. The Environmental Protection Agency placed an off-base dry cleaner, ABC One Hour Cleaners, and Marine Corps Base Camp Lejeune on its National Priorities List in March 1989 and October 1989, respectively. (Maslia Rep. at 23.)
14. On March 28–29, 2005, ATSDR held an Expert Panel on “ATSDR’s Water-Modeling Activities in Support of the Current Study of Childhood Birth Defects and Cancer at U.S. Marine Corps Base Camp Lejeune, North Carolina.” (2005 ATSDR Expert Panel Transcripts and Summary Report.)
15. Between June 2007 and February 2009, ATSDR completed modeling and published reports related to Tarawa Terrace entitled “Analyses of Groundwater Flow, Contaminant Fate and Transport, and Distribution of Drinking Water at Tarawa Terrace and Vicinity, U.S. Marine Corps Base Camp Lejeune, North Carolina: Historical Reconstruction and Present-Day Conditions.” (ATSDR TT Model Chap. A–I Reports.)
16. On April 29–30, 2009, ATSDR held a second Expert Panel regarding “ATSDR’s Methods and Analyses for Historical Reconstruction of Groundwater Resources and Distribution of Drinking Water at Hadnot Point, Holcomb Boulevard, and Vicinity, U.S. Marine Corps Base Camp Lejeune, North Carolina.” (2009 ATSDR Expert Panel Transcripts and Summary Report.)
17. Between October 2010–March 2013, ATSDR completed water modeling and published reports related to Hadnot Point/Holcomb Boulevard entitled “Analyses and Historical Reconstruction of Groundwater Flow, Contaminant Fate and Transport, and Distribution of Drinking Water Within the Service Areas of the Hadnot Point and Holcomb Boulevard Water Treatment Plants and Vicinities, U.S. Marine Corps Base

II. CONTENTIONS.

A. Plaintiff

1. Factual Contentions:

- (a) Plaintiff Frank Mousser enlisted in the United States Marine Corps on July 19, 1982, served two enlistments totaling approximately six years, and was discharged on January 12, 1988, at the rank of Lance Corporal. His military occupational specialties included field artillery batteryman and nuclear field artilleryman.
- (b) Plaintiff was present at Marine Corps Base Camp Lejeune from October 18, 1982 through September 7, 1986, subject to periods of deployment. He worked and resided in areas served by the Hadnot Point water system, including the Hadnot Point and French Creek barracks, and also visited service members at Tarawa Terrace.
- (c) Plaintiff contends that he resided, worked, or was otherwise exposed to water at Camp Lejeune for not less than thirty days between August 1, 1953, and December 31, 1987. Plaintiff further contends that his exposure occurred during a period of particularly high contamination for trichloroethylene and perchloroethylene.
- (d) On September 3, 2020, at age fifty-seven, Plaintiff was diagnosed with high-grade, noninvasive papillary urothelial carcinoma of the right renal pelvis. Plaintiff contends that this upper-tract urothelial carcinoma is a form of kidney cancer and that the kidney-cancer epidemiologic evidence is applicable to the causation analysis.
- (e) From October 20 through October 23, 2020, Plaintiff was hospitalized and underwent a robotic-assisted laparoscopic right radical nephroureterectomy, including removal of the right kidney, the entire ureter, and a bladder cuff, together with retroperitoneal lymph-node dissection and intravesical gemcitabine.
- (f) After surgery, Plaintiff underwent surveillance imaging and cystoscopic examinations. On January 30, 2025, Plaintiff was diagnosed with recurrent metastatic papillary urothelial carcinoma.
- (g) Following removal of his right kidney and ureter, Plaintiff developed declining renal function and stage 3A chronic kidney disease, reflected by rising creatinine beginning in approximately August 2021. Plaintiff contends that his kidney cancer and treatment caused or materially contributed to his chronic kidney disease and future risk of dialysis or transplantation.

- (h) Plaintiff developed severe depression, insomnia, anxiety, irritability, social withdrawal, and adjustment disorder with mixed anxiety and depressed mood following his cancer diagnosis and treatment. Plaintiff contends that these conditions were caused or aggravated by his kidney cancer, treatment, chronic pain, physical limitations, and fear of recurrence, which was realized when metastatic recurrence was diagnosed in January 2025.
- (i) Plaintiff also experiences urinary frequency and nocturia, headaches associated with medication, reduced physical and emotional functioning, and impairment of his household, recreational, social, and marital activities.
- (j) Plaintiff contends that the relationship between his exposure to water at Camp Lejeune and his papillary urothelial carcinoma of the renal pelvis is sufficient to conclude that a causal relationship exists or, alternatively, is sufficient to conclude that a causal relationship is at least as likely as not.
- (k) Plaintiff will rely on evidence concerning the contaminants present in water supplied at Camp Lejeune, his duration and modeled level of exposure, the approximately thirty-four-year latency period, the absence of a family history of cancer or material occupational exposure, and the opinions of his general and specific causation experts.
- (l) Plaintiff had a limited smoking history, smoking less than one pack per week during military service and thereafter only occasionally before quitting completely in 2012. Plaintiff disputes that smoking, prior hematuria, chronic inflammation, burn-pit exposure, weight, latency, or another asserted factor more likely explains his urothelial carcinoma.
- (m) Plaintiff had no family history of kidney cancer, no known employment-related chemical exposure, no history of kidney stones, and no history of hypertension or diabetes before his kidney-cancer diagnosis.
- (n) Before his diagnosis, Plaintiff worked in automotive finance, sales, and customer service and participated in household, recreational, and social activities with his wife and friends. Plaintiff contends that the physical and psychological consequences of his cancer rendered him unable to sustain competitive full-time or part-time employment and contributed to his retirement in October 2023.
- (o) Plaintiff seeks recovery of reasonable and necessary past and future medical expenses, lost household services, and other related economic damages supported by the evidence. VHA provided and/or paid for medical care related to Plaintiff's Track 1 illness and those injuries or conditions stemming from his Track 1 illness or its treatment, and Plaintiff seeks recovery of the reasonable value of such care. Defendant contends, based upon the VHA's

managerial accounting methodology, that the value of such care includes \$43,801.00 in VHA direct costs or \$62,854.00 in VHA indirect and direct costs. Plaintiff's economic and life-care planning experts further calculate future medical and related care expenses ranging from approximately \$765,939.00 to \$799,538.00, depending upon the applicable future-care scenario involving kidney transplantation or hemodialysis. Plaintiff also seeks recovery for lost household services, in an amount to be determined at trial based upon the testimony and evidence presented.

- (p) Plaintiff seeks recovery of past and future loss of earning capacity as well as lost earnings and retirement benefits resulting from his Track 1 illness and related injuries and treatment. Plaintiff's economic expert calculates Plaintiff's total past and future loss of earning capacity, including lost earnings and retirement benefits, at approximately \$286,335.00 to \$358,645.00, depending upon the applicable work-life assumption.
- (q) Plaintiff claims all offsets, including any Veteran Disability Benefits, alleged by the United States as a corresponding damage which was incurred by the respective Plaintiff.
- (r) Plaintiff seeks compensation for past and future physical pain and suffering, mental suffering, inconvenience, loss of normal bodily function, chronic kidney disease, psychological injury, physical limitations, and diminished quality and enjoyment of life resulting from his kidney cancer, nephroureterectomy, metastatic recurrence, continuing surveillance, and related conditions.
- (s) Plaintiff acknowledges that any award must be offset to the extent required by CLJA § 804(e). Plaintiff contends that § 804(e) is limited to a disability award, payment, or benefit provided under a program administered by the Secretary of Veterans Affairs, Medicare, or Medicaid, and provided in connection with health care or a disability relating to exposure to the water at Camp Lejeune.
- (t) Plaintiff contends that the United States bears the burden of establishing the factual and legal basis for each claimed offset. Plaintiff disputes any claimed offset that is duplicative, incorrectly calculated, unsupported by evidence, or, not sufficiently certain and calculable, reasonably probable, and non-speculative, as well as any offset that does not satisfy the source and subject-matter requirements of CLJA § 804(e)(2). See D.E. 885 at 4, 9.

2. Factual Issues:

- (a) Whether Plaintiff resided, worked, or was otherwise exposed to water at Camp Lejeune for not less than thirty days during the statutory period.
- (b) The nature, duration, routes, frequency, and extent of Plaintiff's exposure, including the contaminants and concentrations to which he was exposed.

- (c) Whether the relationship between Plaintiff's exposure to water at Camp Lejeune and his papillary urothelial carcinoma of the right renal pelvis satisfies the CLJA causation standard.
- (d) Whether kidney-cancer epidemiologic evidence applies to Plaintiff's upper-tract urothelial carcinoma.
- (e) Whether another alleged risk factor provides a more likely explanation for Plaintiff's cancer than his exposure to the water at Camp Lejeune.
- (f) Whether Plaintiff's chronic kidney disease, psychological conditions, physical limitations, and vocational impairment were caused by his kidney cancer, treatment, or metastatic recurrence.
- (g) The nature, extent, treatment, prognosis, and future consequences of Plaintiff's recurrent metastatic papillary urothelial carcinoma.
- (h) Whether Plaintiff is unable to sustain competitive employment and the amount of any resulting lost earnings, employment benefits, and household-service losses.
- (i) The reasonable amount of Plaintiff's past and future medical expenses and other economic and noneconomic damages.
- (j) The factual basis and amount of any offset required by CLJA § 804(e).

3. Legal Issues:

- (a) Is Plaintiff entitled to obtain appropriate relief under the Camp Lejeune Justice Act for harm that was caused by exposure to the water at Camp Lejeune?
- (b) What is the appropriate relief for harm that was caused by exposure to the water at Camp Lejeune?
- (c) Is Defendant entitled to an offset required by CLJA § 804(e), and if so, in what amount?

B. The United States

1. Factual Contentions – Water Modeling

- a. No Camp Lejeune water distribution systems other than Tarawa Terrace, Hadnot Point, and Holcomb Boulevard were contaminated.

- b. The Tarawa Terrace water distribution system did not supply contaminated water prior to the 1970s at the earliest or after February 1985 when contaminated-supply-wells were shut down and removed from service.
- c. The Hadnot Point water distribution system did not supply contaminated water prior to July 1972 when supply-well HP-651 was first used or after February 1985 when contaminated-supply wells were shut down and removed from service.
- d. The chemical and physical properties of the COCs in Camp Lejeune water make it unavoidable that substantial portions of the COCs were lost to the air and removed during the water storage, treatment, and distribution process due to volatilization or evaporation.
- e. ATSDR developed Camp Lejeune groundwater models for three water distribution systems only: Tarawa Terrace, Hadnot Point, and Holcomb Boulevard.
- f. ATSDR did not develop Camp Lejeune groundwater models for the six other water distribution systems at Camp Lejeune.
- g. ATSDR's Camp Lejeune groundwater models simulate monthly contaminant concentrations that are inaccurate, biased-high (i.e., higher concentrations over longer timeframes), highly uncertain, and unreliable.
- h. ATSDR had limited to no data to construct their Camp Lejeune groundwater models, including limited well operation or pumping data for very short periods and no data for decades; no observed concentration data prior to 1982; limited observed concentration data, mainly in 1982 and 1985; no information on the timing and rate of contaminant releases to the subsurface; and no contaminant transport parameters specific to Camp Lejeune.
- i. Even if mobile field water tanks (water buffaloes or water bulls) were filled with water from a contaminated water system, which was unlikely for training exercises west of New River, the contaminant concentrations in Camp Lejeune water were likely substantially lower in those tanks due to unavoidable contaminant losses from evaporation or volatilization during filling, use, and variations of temperature. These losses would have been in the order of 41% to 61%.

2. Factual Contentions – History

- a. The Hadnot Industrial Area and the Hadnot Point Landfill Area were the source of contamination of ground water wells connected to the Hadnot Point water treatment plant.

- b. ABC One-Hour Cleaners, located at 2127 Lejeune Boulevard (Highway 24), was the source of the tetrachloroethylene (or PCE) contamination at the Tarawa Terrace water treatment plant.
- c. The Marine Corps used 400-gallon water trailers to supply water for field training at Camp Lejeune during the statutory period. These water trailers were also known as “water buffaloes” or “water bulls.”
- d. At Marine Corps Base Camp Lejeune, only three water treatment plants—Hadnot Point, Tarawa Terrace, and Holcomb Boulevard—supplied water that may have been contaminated at certain times between 1953-1987.
- e. Holcomb Boulevard’s water treatment plant supplied water that may have been contaminated only intermittently when receiving Hadnot Point water between 1971-1985.
- f. Six other areas of the base—Camp Geiger, Camp Johnson/Montford Point, Courthouse Bay, Marine Corps Air Station New River, Onslow Beach, and Rifle Range—were serviced by water treatment plants that did not contain contaminated water.
- g. All nine Water Treatment Plants had standpipes capable of filling 400-gallon water buffalo trailers. Thus, transported water could originate from non-contaminated areas.
- h. ABC One-Hour Cleaners—the source of the Tarawa Terrace contamination—opened in June 1954 or later.
- i. Given the considerable travel distance to Mainside and the relative isolation of Camp Geiger, Camp Johnson/Montford Point, Courthouse Bay, and Rifle Range, Marines assigned to these sections of the base that were served by uncontaminated water systems were unlikely to frequently travel to Mainside areas on Hadnot Point. Each of these remote locations maintained independent infrastructure and essential services, reducing the need for regular travel to Hadnot Point.

3. Factual Contentions – General Causation

- a. Of the chemicals detected in the Camp Lejeune water, the scientific evidence only supports a causal connection between trichloroethylene (“TCE”) and kidney cancer but only at occupational exposure levels that were higher than the environmental levels present at Camp Lejeune.

- b. The ATSDR Camp Lejeune epidemiology studies do not support a causal relationship between exposure to the chemicals in the Camp Lejeune water and kidney cancer.
- c. There is insufficient scientific evidence to support a causal relationship between exposure to the chemicals in the water at Camp Lejeune and upper tract urothelial cancer.
- d. Plaintiff cannot establish general causation between exposure to water at Camp Lejeune and kidney cancer or upper tract urothelial cancer.
- e. The opinions of Plaintiff's experts that there is sufficient evidence of a causal relationship between kidney cancer or upper tract urothelial cancer and the chemicals in water at Camp Lejeune at the levels present at Camp Lejeune are methodologically flawed and unsupported by science.

4. Factual Contentions – Specific Causation:

- a. Plaintiff's cystoscopies in 1983 and 1984 were normal, and Plaintiff was not diagnosed with a malignancy.
- b. Plaintiff experienced microscopic hematuria from 1984 through 2013.
- c. Plaintiff again experienced gross hematuria in 2013.
- d. Plaintiff was not diagnosed with a malignancy at the time of his gross hematuria in 2013.
- e. Plaintiff was not diagnosed with a malignancy at the time of his gross hematuria in 2017.
- f. Plaintiff experienced gross hematuria and flank pain in June and July 2020.
- g. Plaintiff has been diagnosed with mental health conditions by his Veterans Health Administration ("VHA").
- h. Years prior to his cancer diagnosis, Plaintiff was diagnosed with hypertension.
- i. Plaintiff currently takes Lisinopril for his hypertension.
- j. Plaintiff's hypertension is stable and controlled, and it is not made worse by his stable CKD.
- k. Years prior to his cancer diagnosis, Plaintiff was diagnosed with coronary artery disease.
- l. Plaintiff had stents placed in his heart in October 2012 and December 2012.

- m. Plaintiff underwent a quadruple bypass surgery in 2016 for his severe coronary artery disease.
- n. Plaintiff was in a motor vehicle accident in the 1990s.
- o. As a result of this motor vehicle accident, Plaintiff has experienced, and continues to experience, chronic back and other musculoskeletal pain.
- p. Plaintiff was diagnosed with chronic pain syndrome due to his chronic back and other musculoskeletal pain prior to his cancer diagnosis.
- q. Plaintiff remains diagnosed with chronic pain syndrome.
- r. Plaintiff is prescribed and uses opioid medications to treat his musculoskeletal pain.
- s. Mr. Mousser has taken opioids for his back pain for over 15 years, at minimum.
- t. Because of his opioid use, Plaintiff was diagnosed with uncomplicated opioid dependence prior to his cancer diagnosis.
- u. Plaintiff remains diagnosed with uncomplicated opioid dependence.
- v. On January 23, 2019, one of Plaintiff's providers recommended he consider a sleep study for severe obstructive sleep apnea in relation to a diagnosis of daytime somnolence.
- w. Plaintiff is currently diagnosed with severe obstructive sleep apnea.
- x. Plaintiff was prescribed a continuous positive airway pressure ("CPAP") machine, but he reported that he usually wakes up with the mask off.
- y. Plaintiff was diagnosed with insomnia and fatigue prior to his cancer diagnosis.
- z. Plaintiff was diagnosed with overactive bladder years before his cancer diagnosis in 2020.
- aa. Plaintiff is currently diagnosed with pre-diabetes.
- bb. Plaintiff is currently prescribed Empagliflozin for his pre-diabetes.
- cc. Plaintiff is currently diagnosed with tinnitus.
- dd. Plaintiff has received Veterans Benefits Association ("VBA") benefits since 2020.
- ee. In January 2026, Plaintiff's monthly benefits award was \$4,628.12.
- ff. Plaintiff cannot establish specific causation for trichloroethylene ("TCE") and kidney cancer because Plaintiff's alleged exposures are far below the levels at which scientific evidence supports a causal association with kidney cancer.

- gg. Plaintiff cannot establish specific causation for tetrachloroethylene (“PCE”), benzene, or vinyl chloride and kidney cancer because Plaintiff’s alleged exposures to these agents are far below exposure levels evaluated in toxicological studies that did not report significant increases in kidney tumors.
- hh. Plaintiff’s UTUC was not caused by his exposure to Camp Lejeune water.
- ii. Plaintiff’s UTUC was more likely than not caused by his smoking history and chronic inflammation.
- jj. If Plaintiff’s UTUC was not caused by his smoking history and chronic inflammation, it is far more likely than not that his UTUC is idiopathic in origin than caused by exposure to contaminated water at Camp Lejeune.
- kk. The prostatic polyp removed in January 2025 was a recurrence of the original UTUC.
- ll. To the extent Plaintiff alleges that non-Track 1 illnesses other than CKD (*e.g.*, mental health conditions, severe obstructive sleep apnea, insomnia and fatigue, hypertension, diabetes mellitus II, erectile dysfunction, etc.) were caused by exposure to the water or his cancer diagnosis, treatment, and CKD, there is no evidence that these conditions, or the treatment related thereto, are capable of causing or did, in fact, cause those conditions.
- mm. Plaintiff’s UTUC will not impact Plaintiff’s life expectancy.
- nn. Plaintiff’s cardiovascular conditions are more likely to impact his life expectancy than his CKD.
- oo. Plaintiff’s CKD is stable, Stage G3a A1.
- pp. Plaintiff will not require renal replacement therapy in 3-5 years.
- qq. Plaintiff has less than a 1% chance of needing renal replacement therapy in the next 5 years.
- rr. The Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition, Text Revision (“DSM-V-TR”) is the most current and comprehensive resource for the diagnosis and classification of mental disorders used by mental health professionals. (DSM-V-TR; Preface to DSM-5).
- ss. Opioid use disorder is a condition classified in the DSM-V-TR. (DSM-V-TR, p. 832-841).
- tt. Opioid use disorder and uncomplicated opioid dependence share the same ICD-10 code (F11.20).

- uu. The DSM-V-TR states: “Individuals with opioid use disorder are at risk for the development of persistent depressive disorder or major depressive disorder.”
- vv. Major depressive disorder is a condition classified in the DSM-V-TR.
- ww. The DSM-V-TR states: “Adverse childhood experiences, particularly when they are multiple and of diverse types, constitute a set of potent risk factors for major depressive disorder.”
- xx. An adjustment disorder is a condition classified in the DSM-V-TR.
- yy. The DSM-V-TR states: “If an individual has symptoms that meet criteria for a major depressive disorder in response to a stressor, the diagnosis of an adjustment disorder is not applicable. The symptom profile of major depressive disorder differentiates it from adjustment disorders.”
- zz. Obstructive sleep apnea hypopnea is a condition classified in the DSM-V-TR.
- aaa. The DSM-V-TR states: “As many as one-third of individuals referred for evaluation of obstructive sleep apnea hypopnea report symptoms of depression, with as many of 10% having depression scores consistent with moderate to severe depression. Severity of obstructive sleep apnea hypopnea, as measured by the apnea hypopnea index, has been found to be correlated with severity of symptoms of depression. This association may be stronger in men than in women.”
- bbb. The Oswestry Low Back Pain Disability Questionnaire is a psychological assessment tool used by licensed mental health professionals to measure disability in patients with low back pain.
- ccc. Mr. Mousser grew up in a broken home. He did not meet his father, who left his mother before he was born, until he was 13 years old and did not begin to have a relationship with him until he was 19.
- ddd. Mr. Mousser has not spoken with any of his family members for more than 25 years.
- eee. Mr. Mousser does not speak to his daughters from his first marriage.
- fff. Mr. Mousser’s 3-year-old sister was severely injured and permanently disabled in a hit and run accident when Mr. Mousser was also a child.
- ggg. Plaintiff’s mental health conditions are caused by the following, either in isolation or in combination:
 - i. His troubled personal childhood and life, including: coming from a broken home where “the bad times far outweigh the good times”; a history of

- physical, emotional, and verbal abuse from his stepfather; estrangement from his biological father, siblings, and children; and multiple divorces;
- ii. Medical conditions such as his severe obstructive sleep apnea, chronic pain syndrome, uncomplicated opioid dependence, and coronary artery disease;
 - iii. Workplace dynamics and obsolescence at Mercer Motor Company; and
 - iv. The fragility, morbidity, and losses foreseeably associated with aging.
- hhh. Mr. Mousser began working at Mercer Motor Company in January 2023.
- iii. His work situation at Mercer Motor Company added to his depression.
- jjj. Mr. Mousser terminated his employment at Mercer Motor Company in October 2023.
- kkk. Plaintiff's non-kidney related medical conditions, and the symptoms related thereto—including, but not limited to, chronic musculoskeletal pain, hypertension, tinnitus, overactive bladder, severe obstructive sleep apnea, and pre-diabetes—caused him to cease working prematurely.
- lll. Plaintiff will continue to receive monthly VBA benefits for the remainder of his lifetime.
- mmm. All healthcare related to Plaintiff's UTUC diagnosis and treatment, CKD, and mental health conditions has been through VHA.
- nnn. If Plaintiff requires additional medical treatment for these conditions, it is reasonably certain that he will receive this care through VHA.

5. Factual Contentions – Damages

- a. Plaintiff has received and will receive disability and/or healthcare awards, payments or benefits relating to exposure to the water at Camp Lejeune.
- b. Plaintiff has obtained health care from the VHA in connection with his UTUC.
- c. If Plaintiff is found to require future health care for or related to his UTUC, it is reasonably certain that such health care will be obtained from the VHA.
- d. Plaintiff has received disability compensation from the VBA in connection with his UTUC.
- e. It is reasonably certain that Plaintiff will continue to receive disability compensation from the VBA in connection with his UTUC.

- f. It is reasonably certain that Plaintiff will continue to receive disability compensation from the VBA in connection with his UTUC at an amount reasonably similar or the same as he currently receives, adjusted for cost of living.

6. Factual Issues – Water Modeling

- a. Did the Tarawa Terrace water distribution system supply contaminated water prior to the 1970s at the earliest or after February 1985 when contaminated-supply-wells were shut down and removed from service?
- b. Did the Hadnot Point water distribution system supply contaminated water prior to July 1972 when supply-well HP-651 first began operating or after February 1985 when contaminated supply-wells were shut down and removed from service?
- c. Were the Tarawa Terrace, Hadnot Point, and Holcomb Boulevard water distribution systems the exclusive sources of contaminated water supplied by the United States at Camp Lejeune?
- d. Was the Plaintiff exposed to contaminants in water supplied by the United States at Camp Lejeune, and, if so, what was the extent of that exposure?

7. Factual Issues – History

- a. Did ABC One-Hour Cleaners, the source of the Tarawa Terrace contamination, open in June 1954 at the earliest?

8. Factual Issues – Specific Causation

- a. Did Plaintiff's exposure to water at Camp Lejeune cause his UTUC, or was it more likely caused by Plaintiffs' smoking, chronic inflammation, or idiopathy?
- b. Is Plaintiff reasonably likely to require renal replacement therapy in 3-5 years?
- c. To what extent are Plaintiff's mental health conditions caused by his cancer diagnosis, treatment, and resulting CKD, or related to other factors such as childhood trauma, other medical conditions, workplace dynamics, and aging?
- d. Did Plaintiff's kidney-related conditions cause him to stop working in October 2023?

9. Factual Issues – Damages

- a. What is the amount of economic damage that Plaintiff suffered related to water contamination at Camp Lejeune, if any?
- b. What is the amount of non-economic damage that Plaintiff suffered related to water contamination at Camp Lejeune, if any?

- c. What amount of disability awards, payments, or benefits has already been provided to Plaintiff under the laws administered by the Secretary of Veterans Affairs in connection with health care or a disability relating to exposure to the water at Camp Lejeune?
- d. What calculable amount of disability awards, payments, or benefits is sufficiently certain to be provided to Plaintiff under the laws administered by the Secretary of Veterans Affairs in connection with health care or a disability relating to exposure to the water at Camp Lejeune?

10. Legal Issues – Water Modeling

- a. Do ATSDR’s Camp Lejeune groundwater models meet the requirements of Federal Rule of Evidence 702 and Daubert such that they can reliably be used or relied upon to make accurate individual plaintiff exposure determinations for any period between August 1, 1953 and December 31, 1987?

11. Legal Issues – Specific Causation

- a. To the extent Plaintiff alleges non-Track 1 illnesses (e.g., mental health conditions, severe obstructive sleep apnea, insomnia and fatigue, hypertension, etc.), those alleged injuries do not constitute “other injuries or conditions stemming from a Track 1 Illness or its treatment” within the meaning of this Court’s Case Management Order No. 12. Therefore, Plaintiff “waiv[ed] [his] rights” to allege that such an injury was “caused by the water at Camp Lejeune.” CMO 12, Dkt. No. 232, at 1.
- b. Dr. Kelly Reynolds does not provide reliable estimates of Plaintiff’s exposure to trichloroethylene (“TCE”), tetrachloroethylene (“PCE”), benzene, and vinyl chloride from which to determine whether Plaintiff experienced exposures sufficient to cause kidney cancer.

12. Legal Issues – Damages

- a. What category of damages is Plaintiff permitted to seek under the Camp Lejeune Justice Act in order to seek “appropriate relief from harm?”
- b. Does “appropriate relief from harm” under the Camp Lejeune Justice Act include Plaintiff’s claim for past and future economic damages? If so, what categories of economic damages?
- c. Is Plaintiff permitted to seek the amounts charged by or amounts paid to a medical provider as a measure of past medical damages? Or is Plaintiff limited to the reasonable past value of medical expenses?

- d. Is Plaintiff barred from requesting an award amount above the amount Plaintiff requested in the administrative claim?

13. Reservation of Rights

- a. The United States reserves the right to supplement or otherwise amend such other contentions that arise from the evidence at trial.

III. CLAIMS AND DEFENSES NOT ABANDONED

A. Plaintiff

1. Count 1 in Master Complaint, D.E. 25, at 42-22: Relief Under the Camp Lejeune Justice Act.
2. Section VII in the Short Form Complaint, as Amended: Claim for Relief.

B. The United States' Affirmative Defenses to Plaintiffs' Count 1

1. Any award is limited to compensatory damages.
2. Any award is limited to the amount stated in the administrative claim, and any relief requested over and above that amount is barred.
3. Any award is subject to appropriate offsets under the Camp Lejeune Justice Act.
4. The United States' liability, if any, is subject to appropriate offsets for services or care which the United States has already paid.
5. The United States' liability under the CLJA, if any, is limited to claims accruing before August 10, 2022.

IV. EXHIBITS.

A. Plaintiff

Ex. #	TITLE	OBJECTIONS
<u>Water Modeling Exhibits (Phase I)</u>		
1	TTHM Surveillance Report Form (2-26-1981) (Bates CLJA_WATERMODELING_01-0000201969)	
2	Defendant United States of America's Responses to Plaintiff's Second Set of Interrogatories (March 6, 2024).	The United States restates its responses and objections

		to the PLG's Second Set of Interrogatories Nos. 1 and 2
3	Curriculum Vitae for Morris L. Maslia, P.E.	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]; the hearsay objection to the expert witness report is waived if the expert testifies at trial, pursuant to agreement of the Parties
4	Map showing the Hadnot Point-Holcomb Boulevard study area, U.S. Marine Corps Base Camp Lejeune, North Carolina (Figure A.1 from Analyses and Historical Reconstruction of Groundwater Flow, Contaminant Fate and Transport, and Distribution of Drinking Water Within the Service Areas of the Hadnot Point and Holcomb Boulevard Water Treatment Plants and Vicinities, U.S. Marine Corps Base Camp Lejeune, North Carolina Chapter A: Summary and Findings (ATSDR March 2013) (Bates CLJA_WATERMODELING_01-0000942605)	
5	Grainger Laboratories, Inc. Memorandum to Commanding General, Marine Corps Base Camp Lejeune (8-10-1982) (Bates CLJA_WATERMODELING_01-0000342890 through CLJA_WATERMODELING_01-0000342893).	
6	Amalgamated Exhibit of ATSDR Chapters, Summaries, and Supplements Comprising the Analyses and Historical Reconstruction of Groundwater Flow, Contaminant Fate and Transport, and Distribution of Drinking Water at Tarawa Terrace and Vicinity and Within the Service Areas of the Hadnot Point and Holcomb Boulevard Water Treatment Plants and Vicinities, U.S. Marine Corps Base Camp Lejeune, North Carolina (collectively the "ATSDR Water Model Reports"), including:	

	Chapter A: Summary and Findings (Hadnot Point & Holcomb Blvd) (Bates CLJA_WATERMODELING_01- 0000942579 – 942788)	
	Chapter A: Supplement 1 (Hadnot Point & Holcomb Blvd) (Bates CLJA_WATERMODELING_05-0000782151 – 782268)	
	Chapter A: Supplement 2 (Hadnot Point & Holcomb Blvd) (Bates CLJA_WATERMODELING_05-0000782803 – 782938)	
	Chapter A: Supplement 3 (Hadnot Point & Holcomb Blvd) (Bates CLJA_WATERMODELING_05-0000824492 – 824603)	
	Chapter A: Supplement 4 (Hadnot Point & Holcomb Blvd) (Bates CLJA_WATERMODELING_05-0000777405 – 777470)	
	Chapter A: Supplement 5 (Hadnot Point & Holcomb Blvd) (Bates CLJA_WATERMODELING_05-0000055698 – 55757)	
	Chapter A: Supplement 6 (Hadnot Point & Holcomb Blvd) (Bates CLJA_WATERMODELING_05-0000783320 – 783394- CLJA_WATERMODELING_05-0000814107 – 814181)	
	Chapter A: Supplement 7 (Hadnot Point & Holcomb Blvd) (Bates CLJA_WATERMODELING_05-0000237237 – 237292)	
	Chapter A: Supplement 8 (Hadnot Point & Holcomb Blvd) (Bates CLJA_WATERMODELING_05-0000784387 – 784597)	
	Chapter B: Geohydrologic Framework (Hadnot Point & Holcomb Blvd) (Bates CLJA_WATERMODELING_05-0000774394 – 774590)	
	Chapter C: Contaminant Occurrence at Restoration Program Sites (Hadnot Point & Holcomb Blvd) (Bates CLJA_WATERMODELING_01-0000033612 – 33913)	
	Chapter D: Contaminant Occurrence at Storage Tank Sites (Hadnot Point & Holcomb Blvd) (Bates	

	CLJA_WATERMODELING_01-0000034873 – 35183)	
	Chapter A Summary and Findings (Tarawa Terrace) (Bates CLJA_WATERMODELING_09-0000615638 – 615753)	
	Chapter B Geohydrologic Framework (Tarawa Terrace) (Bates CLJA_WATERMODELING_01-0000763440 – 763467)	
	Chapter C Groundwater Flow Simulation (Tarawa Terrace) (Bates CLJA_WATERMODELING_01-0000092939 - 93045	
	Chapter D Compound Properties and Degradation Pathways (Tarawa Terrace) (Bates CLJA_WATERMODELING_01-0000066648 – 66709)	
	Chapter E Occurrence of Contaminants in Groundwater (Tarawa Terrace) (Bates CLJA_WATERMODELING_01- 0000754791 – 754838)	
	Chapter F PCE Fate and Transport (Tarawa Terrace) (Bates CLJA_WATERMODELING_01- 0000093047 – 93114)	
	Chapter G PCE Mass Transport (Tarawa Terrace) (Bates CLJA_WATERMODELING_09-0000551691 – 551762)	
	Chapter H Pumping Schedule Effects (Tarawa Terrace) (Bates CLJA_WATERMODELING_01- 0000768339 – 768398)	
	Chapter I Parameter Sensitivity, Uncertainty, and Variability (Tarawa Terrace) (Bates CLJA_WATERMODELING_01-0000093115 – 93218)	
	Executive Summary (Tarawa Terrace) (Bates CLJA_WATERMODELING_01-0000775401 – 775420).	
7	Simulated PCE and PCE Degradation By-Products in Finished Water, Tarawa Terrace Water Treatment Plant, January 1951–March 1987 (Bates CLJA_WATERMODELING_01-0001110687 through CLJA_WATERMODELING_01-00001110699)	

8	Reconstructed (simulated) monthly mean concentrations in finished water for tetrachloroethylene (PCE), trichloroethylene (TCE), trans-1,2-dichloroethylene (1,2-tDCE), and vinyl chloride (VC) at the Hadnot Point water treatment plant, Hadnot Point–Holcomb Boulevard Study Area, U.S. Marine Corps Base Camp Lejeune, North Carolina, January 1942– June 2008 (CLJA_WATERMODELING_01-0000942759 through CLJA_WATERMODELING_01-0000942774)	
9	Reconstructed (simulated) monthly mean concentrations of tetrachloroethylene (PCE), trichloroethylene (TCE), trans-1,2-dichloroethylene (1,2-tDCE), vinyl chloride (VC), and benzene in finished water distributed to Holcomb Boulevard family housing areas, Hadnot Point– Holcomb Boulevard study area, U.S. Marine Corps Base Camp Lejeune, North Carolina, 1972–1985. (Bates CLJA_WATERMODELING_01-0000942775 through CLJA_WATERMODELING_01-0000942780).	
10	Figure showing reconstructed finished-water concentrations of tetrachloroethylene (PCE), trichloroethylene (TCE), trans-1,2 dichloroethylene (1,2-tDCE), vinyl chloride (VC), and benzene, and measured concentrations (Faye et al. 2010), Hadnot Point water treatment plant, Hadnot Point–Holcomb Boulevard study area, U.S. Marine Corps Base Camp Lejeune, North Carolina (Figure A27 from Analyses and Historical Reconstruction of Groundwater Flow, Contaminant Fate and Transport, and Distribution of Drinking Water Within the Service Areas of the Hadnot Point and Holcomb Boulevard Water Treatment Plants and Vicinities, U.S. Marine Corps Base Camp Lejeune, North Carolina Chapter A: Summary and Findings (ATSDR March 2013) (Bates CLJA_WATERMODELING_01-0000942665)	
11	Expert Report of Morris Maslia PE (2024-10-25)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to

		United States Motion to Exclude [D.E. 367]; the hearsay objection to the expert witness report is waived if the expert testifies at trial, pursuant to agreement of the Parties
12	Rebuttal Expert Report of Morris Maslia PE (2025-1-14)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]; the hearsay objection to the expert witness report is waived if the expert testifies at trial, pursuant to agreement of the Parties
13	Expert Peer Review Panel Evaluating ATSDR's Current Water-Modeling Activities in Support of the Current Study of Childhood Birth Defects and Cancer at U.S. Marine Corps Base Camp Lejeune, North Carolina: Analyses of Groundwater Resources and Present-Day (2004) Water Distribution Systems (ATSDR October 2005) (Bates CLJA_UST02-0001186681 through CLJA_UST02-0001186770).	
14	Expert Panel Assessing ATSDR's Methods and Analyses for Historical Reconstruction of Groundwater Resources and Distribution of Drinking Water at Hadnot Point, Holcomb Boulevard, and Vicinity, U.S. Marine Corps Base Camp Lejeune, North Carolina (ATSDR December 2009) (Bates ATSDR_WATERMODELING_01-0000855576 through ATSDR_WATERMODELING_01-0000855734)	
15	Transcript of April 29, 2009 Expert Panel Meeting regarding the Analysis and Historical Reconstruction of Groundwater Resources and Distribution of Drinking Water at Hadnot Point, Holcomb Boulevard and Vicinity, U.S. Marine Corps Base, Camp Lejeune,	

	North Carolina (Bates CLJA_WATERMODELING_01-0000011878 through CLJA_WATERMODELING_01-0000012497)	
16	Transcript of April 30, 2009 Expert Panel Meeting regarding the Analysis and Historical Reconstruction of Groundwater Resources and Distribution of Drinking Water at Hadnot Point, Holcomb Boulevard and Vicinity, U.S. Marine Corps Base, Camp Lejeune, North Carolina (Bates CLJA_WATERMODELING_01-0000012221 through CLJA_WATERMODELING_01-0000012220)	
17	Transcript of March 28, 2005 Expert Peer Review Panel regarding ATSDR'S Historical Reconstruction Analysis, Camp Lejeune North Carolina (Volume I) (Bates CLJA_WATERMODELING_01-0000942325 through CLJA_WATERMODELING_01- 0000942578)	
18	Transcript of March 29, 2005 Expert Peer Review Panel regarding ATSDR'S Historical Reconstruction Analysis, Camp Lejeune North Carolina (Volume II) (Bates ATSDR_WATERMODELING_01- 0000857052)	
19	ATSDR Response to the 2009 National Research Council (NRC) Report, Contaminated Water Supplies at Camp Lejeune—Assessing Potential Health Effects (CLJA_ATSDR_BOVE_HC_0000007656 through CLJA_ATSDR_BOVE_HC_0000007697)	
20	AH Environmental Final Report, ATSDR Support- Estimation of VOC Removal, Marine Corps Base Camp Lejeune, North Carolina (December 2004) (CLJA_WATERMODELING_01 -0000071446 through CLJA_WATERMODELING_01- 0000071511)	
21	ATSDR Response to the Department of the Navy's Letter on: Assessment of ATSDR Water Modeling For Tarawa Terrace (ATSDR March 2009) (Bates CLJA_2019ATSDR04-0000001175 through CLJA_2019ATSDRO04-0000001245)	
22	Curriculum Vitae for Dr. David Sabatini	Hearsay, FRE 802; the hearsay objection to the

		expert witness report is waived if the expert testifies at trial, pursuant to agreement of the Parties
23	Expert Rebuttal Report of David Sabatini, PhD, PE, BCEE (January 14, 2025)	Hearsay, FRE 802; the hearsay objection to the expert witness report is waived if the expert testifies at trial, pursuant to agreement of the Parties
24	Demonstrative Exhibits from ATSDR Hadnot Point and Holcomb Blvd Water Model Reports (Figures & Tables)	Reserving objections for records not previously produced, Local Rule 16.1(c)(3)
25	Demonstrative Exhibits from ATSDR Tarawa Terrace Water Model Reports (Figures & Tables)	Reserving objections for records not previously produced, Local Rule 16.1(c)(3)
26	Demonstrative Figures and Tables from Expert Report - Morris Maslia PE (2024-10-25)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]; the hearsay objection to the expert witness report is waived if the expert testifies at trial, pursuant to agreement of the Parties
27	Demonstrative Figures and Tables from Rebuttal Report - Morris Maslia PE (2025-01-14)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]; the hearsay objection to the expert witness report is waived if the expert testifies at trial, pursuant to agreement of the Parties

28	Demonstrative Figures and Tables from Rebuttal Report - Dr David Sabatini (2025-01-14)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]; the hearsay objection to the expert witness report is waived if the expert testifies at trial, pursuant to agreement of the Parties
29	The Plaintiffs' Leadership Group's Master Complaint, D.E. 25 in 7:23-CV-00897-RJ, Designated Pursuant to Local Civil Rule 16.1(c)(4)	
30	Defendant's Answer to the Master Complaint, D.E. 50 in 7:23-CV-00897-RJ, Designated Pursuant to Local Civil Rule 16.1(c)(4)	
31	Defendant's Responses to the PLG's Second Set of Interrogatories, Nos. 1 & 2, Designated Pursuant to Local Civil Rule 16.1(c)(4)	The United States restates its responses and objections to the PLG's Second Set of Interrogatories Nos. 1 and 2
32	Defendant's Responses to Plaintiff's Request for Admissions for Track 1 Discovery Plaintiffs, Nos. 4, 8, 28-30, 33-39, 41, 43, 56, 78, 80-82, 85, 92, 122, & 125-129, Designated Pursuant to Local Civil Rule 16.1(c)(4)	The United States restates its responses and objections to Plaintiffs' Requests for Admission for Track 1 Discovery Plaintiffs Nos. 4, 8, 28-30, 33-39, 41, 43, 56, 78, 80-82, 85, 92, 122, and 125-129
<u>General Causation Exhibits (Phase II)</u>		
33	Camp Lejeune Justice Act	
34	Dr. Benjamin Hatten GC Rep. 12/8/2024 (Kidney)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motions to Exclude [D.E. 574, 609; 886; 890]; the hearsay objection to the expert

		witness report is waived if the expert testifies at trial pursuant to agreement of the Parties
35	Dr. Benjamin Hatten's CV	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motions to Exclude [D.E. 574, 609; 886; 890]; the hearsay objection to the expert witness report is waived if the expert testifies at trial pursuant to agreement of the Parties
36	Dr. Kathleen Gilbert GC Rep. 12/8/2024 (Kidney)	Hearsay, FRE 802, expert opinions unhelpful and unreliable, FRE 702 & 703; the hearsay objection to the expert witness report is waived if the expert testifies at trial pursuant to agreement of the Parties
37	Dr. Kathleen Gilbert's CV	Hearsay, FRE 802, expert opinions unhelpful and unreliable, FRE 702 & 703; the hearsay objection to the expert witness report is waived if the expert testifies at trial pursuant to agreement of the Parties
38	Dr. Steven Bird GC Rep. 12/8/2024 (Kidney)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 574, 609, 886, 890] ; the hearsay objection to the expert

		witness report is waived if the expert testifies at trial pursuant to agreement of the Parties
39	Dr. Steven Bird's GC Suppl. Rep. 2/5/2025 (Kidney)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 574, 609, 886, 890]; the hearsay objection to the expert witness report is waived if the expert testifies at trial pursuant to agreement of the Parties
40	Dr. Steven Bird's CV	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 574, 609, 886, 890]; the hearsay objection to the expert witness report is waived if the expert testifies at trial pursuant to agreement of the Parties
41	Expert Report of Dr. Julie Goodman for Kidney Cancer 2/7/2025	
42	Goodman, Julie E., Zu, Jr, Loftus, Christine T., Lynch, Heather N., Prueitt, Robyn L., Mohar, Isaac, Shubin, Sara P., Sax, Sonja N. 2018. "Short-term ozone exposure and asthma severity: Weight-of-evidence analysis."	Relevance, FRE 401; Hearsay, FRE 802; lack of foundation, authenticity, FRE 901
43	United States, Department of Health & Human Services, Agency for Toxic Substances and Disease Registry ("ATSDR"), 2017 Assessment of the Evidence for the Drinking Water Contaminants at Camp	

	Lejeune and Specific Cancers and Other Diseases, January 13, 2017	
44	United States, Department of Health & Human Services, ATSDR, Public Health Assessment for Camp Lejeune Drinking Water U.S. Marine Corps Base Camp Lejeune, North Carolina, January 20, 2017	
45	United States, Department of Health & Human Services, ATSDR, Toxicological Profile for Trichloroethylene, June 2019	
46	United States, Environmental Protection Agency (“EPA”), Toxicological Review of Trichloroethylene (CAS No. 79-01-6) In Support of Summary Information on the Integrated Risk Assessment System (IRIS), September 2011	
47	United States, EPA, Integrated Risk Information System (IRIS) Chemical Assessment Summary Trichloroethylene; CASRN 79-01-6 (Last Revised 9/28/2011)	
48	United States, EPA, Risk Evaluation for Trichloroethylene CASRN 79-01-6, November 2020	
49	United States, EPA, Trichloroethylene Unreasonable Risk Determination, December 2022	
50	International Agency for Research on Cancer (“IARC”), Monograph on the Evaluation of Carcinogenic Risks to Humans, 2014, Trichloroethylene, Tetrachloroethylene and Some Other Chlorinated Agents, Vol. 106	
51	United States, Department of Health and Human Services, National Toxicology Program (“NTP”), Report on Carcinogens Monograph on Trichloroethylene RoC Monograph 05, January 2015	
52	United States, Department of Health and Human Services, NTP, Report on Carcinogens, Fifteenth Edition, Trichloroethylene, CAS No. 79-01-6, 2021	
53	Institute of Medicine (“IOM”), Gulf War and Health: Volume 2: Insecticides and Solvents (2003)	
54	IOM, Review of VA Clinical Guidance for the Health Conditions Identified by the Camp Lejeune Legislation, 2015	

55	United States, EPA, Toxicological Review of Tetrachloroethylene (Perchloroethylene) (CAS No. 127-18-4) In Support of Summary Information on the Integrated Risk Information System (IRIS), February 2012	
56	United States, EPA, Risk Evaluation for Perchloroethylene (Ethene, 1,1,2,2-Tetrachloro-) CASRN: 127-18-4, December 2020	
57	United States, EPA, Carcinogenic Effects of Benzene: An Update, April 1998	
58	IARC, Monographs on the Evaluation of the Carcinogenic Risk of Chemicals to Humans, 1982, Some Industrial Chemicals and Dyestuffs, Vol 29	
59	IARC, Monographs on the Evaluation of the Carcinogenic Risks to Humans, 1987, Overall Evaluations of Carcinogenicity: An Updating of IARC Monographs, Vols. 1-42	
60	IARC, Monograph on the Evaluation of Carcinogenic Risks to Humans, 2018, Benzene, Vol. 120	
61	IARC, Monographs on the Evaluation of Carcinogenic Risks to Humans, 2012, Chemical Agents and Related Occupations, Vol 100F A Review of Human Carcinogens	
62	United States, Department of Health and Human Services, NTP, Report on Carcinogens, Eleventh Edition, Carcinogen Profiles, 2004	
63	United States, Department of Health and Human Services, NTP, Report on Carcinogens, Twelfth Edition, 2011	
64	United States, Department of Health and Human Services, NTP, Report on Carcinogens, Fourteenth Edition, 2016	
65	United States, Department of Health and Human Services, NTP, Report on Carcinogens, Fifteenth Edition, Benzene, 2021	
66	United States, Department of Health & Human Services, ATSDR, Toxicological Profile for Benzene, Draft for Public comment, October 2024	

67	United States, Department of Health & Human Services, ATSDR Toxicological Profiles for Vinyl Chloride, January 2024	
68	United States, Department of Health and Human Services, NTP, Report on Carcinogens, Fifteenth Edition, Tetrachloroethylene, 2021	
69	United States, EPA, Toxicological Review of Vinyl Chloride (CAS No. 75-01-4) In Support of Summary Information on the Integrated Risk Information System (IRIS), May 2000	
70	IARC, Monographs on the Evaluation of Carcinogenic Risks to Humans, 2008, 1, 3-Butadiene, Ethylene Oxide and Vinyl Halides (Vinyl Fluoride, Vinyl Chloride and Vinyl Bromide), Vol. 97	
71	United States, Department of Health and Human Services, NTP, Report on Carcinogens, Fifteenth Edition, Vinyl Halides (Selected), 2021	
72	ATSDR 2018 Morbidity Study	
73	Bove 2014 Mort. Study – Civ.	
74	Bove 2014 Mort Study – Civ. (Additional Files)	
75	Bove 2014 Mort. Study – Mil.	
76	Bove 2014 Mort. Study – Mil. (Additional Files)	
77	Bove 2024 Cancer Incid. Study	
78	Bove 2024 Cancer Incid. Study (Suppl. File)	
79	Bove 2024 Cancer Incid. Study – Preprint	
80	Bove 2024 Mort. Study	
81	Bove 2024 Mort. Study (Suppl. File)	
82	United States Environmental Protection Agency, December 9, 2024, Press Release, "Biden-Harris Administration Announces Latest Actions Under Nation's Chemical Safety Law to Protect People from Cancer-Causing Chemicals Trichloroethylene and Perchloroethylene."	Relevance, FRE 402 & 403; lack of foundation, authenticity, FRE 901
83	United States Environmental Protection Agency, December 6, 2024, Pre-Publication Notice of Final Rule, "Perchloroethylene (PCE); Regulation under the Toxic Substances Control Act (TSCA). FRL #: 8329-01-OCSP; Docket ID #: EPA-HQ-OPPT-2020-0270."	Relevance, FRE 402 & 403
84	United States Environmental Protection Agency, December 6, 2024, Pre-Publication Notice of Final	Relevance, FRE 402 & 403

	Rule, "Trichloroethylene (TCE) ; Regulation under the Toxic Substances Control Act (TSCA). FRL #: 8317-02-OCSP; Docket ID #: EPA-HQ-OPPT-2020-0642."	
85	United States Environmental Protection Agency, December 18, 2024, Final Rule, Federal Register Vol. 89, No. 243, 40 CFR Part 751, "Perchloroethylene (PCE); Regulation Under the Toxic Substances Control Act (TSCA)."	Relevance, FRE 402 & 403
86	United States Environmental Protection Agency, December 17, 2024, Final Rule, Federal Register Vol. 89, No. 242, 40 CFR Part 751, "Trichloroethylene (TCE); Regulation Under the Toxic Substances Control Act (TSCA)."	Relevance, FRE 402 & 403
87	Deposition Transcript of Frank Bove, Designated Pursuant to Local Civil Rule 16.1(c)(4)	Objections are stated separately in the United States' objections to Plaintiff's deposition designations. The United States also maintains any objections made during the excerpted transcript section(s).
<u>Specific Causation Exhibits (Phase IIIa)</u>		
88	Mousser's Medical Records (All Records Produced During Discovery)	Unidentifiable, FRCP 26(a)(3)(iii); impermissibly broad FRCP 26(a)(3)
89	Key Medical Records for Frank Mousser ¹	

¹ This Exhibit consists of the documents located at the following Bates Nos.: 00667_MOUSSER_0000000751-775, 00667_MOUSSER_0000000600-606, 00667_MOUSSER_VHA_00000001814-1819, 00667_MOUSSER_VHA_00000001811-1813, 00667_MOUSSER_00000004911-4916, 00667_MOUSSER_VHA_00000001631-1638, 00667_MOUSSER_00000000803-806, 00667_MOUSSER_0000000052-56, 00667_MOUSSER_0000000076-80, 00667_MOUSSER_00000000528-534, 00667_MOUSSER_0000000793-794, 00667_MOUSSER_VHA_00000001462-1468, 00667_MOUSSER_0000000192-196, 00667_MOUSSER_0000000764-765, 00667_MOUSSER_00000008619-8621, 00667_MOUSSER_VBA_00000000337, 00667_MOUSSER_VHA_00000001462-1468, 00667_MOUSSER_0000000640-643, 00667_MOUSSER_0000000730-733, 00667_MOUSSER_0000000744-747, 00667_MOUSSER_0000000753, 00667_MOUSSER_0000000784-788, 00667_MOUSSER_00000008619-8621, 00667_MOUSSER_VBA_0000000286-288, 00667_MOUSSER_0000000298-303, 00667_MOUSSER_0000000640-643, 00667_MOUSSER_VHA_00000001724, 00667_MOUSSER_0000000454-459, 00667_MOUSSER_00000004618-4622, 00667_MOUSSER_00000004611-4617, 00667_MOUSSER_00000004630, 00667_MOUSSER_00000004849-4852, 00667_MOUSSER_0000000793-801, 00667_MOUSSER_0000000784-788, 00667_MOUSSER_0000000767-769, 00667_MOUSSER_VBA_00000009351, 00667_MOUSSER_00000002334-2335, 00667_MOUSSER_0000000755, 00667_MOUSSER_0000000708-718, 00667_MOUSSER_0000000853-856, 00667_MOUSSER_0000000496-502, 00667_MOUSSER_0000000492-495

90	Frank Mousser's Military Records Supporting Exposure at Camp Lejeune (00667_MOUSSER_NARA_0000000051-52; 0067_MOUSSER_0000006040)	Hearsay, FRE 802; lack of foundation, authenticity, FRE 901; incomplete, FRE 106
91	Cumulative Exposure Expert Report of Kelly A. Reynolds, MSPH, PhD with Appendices 2/7/2025	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; the hearsay objection to the expert witness report is waived if the expert testifies at trial pursuant to agreement of the Parties
92	Dr. Kelly A. Reynolds' CV	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; the hearsay objection to the expert witness report is waived if the expert testifies at trial pursuant to agreement of the Parties
93	Frank Mousser Exposure Timelines (PLG-EXPERT_REYNOLDS_0000000008	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; the hearsay objection to the expert witness report is waived if the expert testifies at trial pursuant to agreement of the Parties
94	Reynolds Calculations – Appendix for Mousser (PLG-EXPERT_REYNOLDS_0000000093-94	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; the hearsay objection to the expert witness report is waived if the expert testifies at trial pursuant to agreement of the Parties. This Bates range does not correspond with the described exhibit.

95	Reynolds Calculations Summary – Appendix for Mousser, dated March 28, 2025 (PLG-EXPERT_REYNOLDS_0000000036)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; the hearsay objection to the expert witness report is waived if the expert testifies at trial pursuant to agreement of the Parties
96	Dr. Armine K Smith SC Rep. 2/7/2025 (Mousser)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 569]; the hearsay to the report is waived if the expert testifies at trial pursuant to agreement of the Parties
97	Dr. Armine K Smith’s Supplemental SC Rep. 4/9/2025 (Mousser)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 569]; the hearsay to the report is waived if the expert testifies at trial pursuant to agreement of the Parties
98	Dr. Armine K Smith’s Rebuttal SC Rep. 5/14/2025 (Mousser)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 569]; the hearsay to the report is waived if the expert testifies at trial pursuant to agreement of the Parties
99	Errata to Dr. Smith’s Report 7/1/2025 (Mousser)	Hearsay, FRE 802; expert opinions unhelpful and

		unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 569]; the hearsay to the report is waived if the expert testifies at trial pursuant to agreement of the Parties
100	Dr. Armine K. Smith's CV	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 569]; the hearsay to the report is waived if the expert testifies at trial pursuant to agreement of the Parties
101	Dr. Joseph Del Pizzo SC Rep. 2/3/2025 (Mousser)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 569]; the hearsay to the report is waived if the expert testifies at trial pursuant to agreement of the Parties
102	Dr. Joseph Del Pizzo Supplemental SC Rep. 4/8/2025 (Mousser)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 569]; the hearsay to the report is waived if the expert testifies at trial pursuant to agreement of the Parties
103	Errata to Dr. Joseph Del Pizzo's Report 7/23/2025 (Mousser)	Hearsay, FRE 802; expert opinions unhelpful and

		unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 569]; the hearsay to the report is waived if the expert testifies at trial pursuant to agreement of the Parties
104	Dr. Joseph Del Pizzo's CV	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 569]; the hearsay to the report is waived if the expert testifies at trial pursuant to agreement of the Parties
105	Discovery Pool Profile Form for Frank Mousser	
106	FRE Rule 1006 Summary of Medical Records for Frank Mousser	Reserving objections for records not previously produced, Local Rule 16.1(c)(3)
<u>Damages and Offsets Exhibits (Phase IIIb)</u>		
107	Frank and Heather Mousser's Income Tax Returns for 2018 to 2022 (00667_MOUSSER_0000000005-22)	Authenticity, FRE 901; hearsay, FRE 802
108	Social Security Earnings Statements of Frank W. Mousser dated November 13, 2023 (00667_MOUSSER_0000000001-4)	
109	Frank Mousser's Employment Records – Mercer Motor Company (00667_MOUSSER_MM_0000000001-24)	Authenticity, FRE 901; hearsay, FRE 802
110	Frank Mousser's Employment Records – Cecil Atkission Automotive Group (00667_MOUSSER_CAM_0000000001-231)	Authenticity, FRE 901; hearsay, FRE 802
111	July 9, 2020 VBA Letter re Rating Decision (00667_MOUSSER_VBA_0000031585-31589)	
112	December 16, 2020 VBA Letter re Rating Decision (00667_MOUSSER_VBA_0000030857-30861)	

113	February 22, 2032 VBA Letter re Decision on VA Benefits (00667_MOUSSER_VBA_0000030802-30812)	
114	January 24, 2022 VBA Letter re Rating Decision (00667_MOUSSER_VBA_0000029262-29268)	
115	April 6, 2022 VBA Letter re Rating Decision (00667_MOUSSER_VBA_000002717-2721)	
116	June 2, 2022 VBA Letter re Rating Decision (00667_MOUSSER_VBA_0000027738-27742)	
117	October 21, 2022 VBA Letter re Decision of VA Benefits (00667_MOUSSER_VBA_0000027726-27737)	
118	February 7, 2023 VBA Letter re Rating Decision (00667_MOUSSER_VBA_0000026850-26854)	
119	December 1, 2023 VBA Letter re Rating Decision (00667_MOUSSER_VBA_0000008220-8224)	
120	April 1, 2024 VBA Letter re Rating Decision (00667_MOUSSER_VBA_0000008692-8698)	
121	March 28, 2022 QTC Appointment Notice and April 5, 2022 Dr. Swanholm – Psychology Examiner at VA (00667_MOUSSER_0000006549-6560)	
122	March 22, 2024 Dr. Croft – Psychiatry at VA (00667_MOUSSER_VBA_0000010791-10797)	
123	Dr. Matthew Cooper SC Rep. 2/2/2025 (Mousser)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; the hearsay to the report is waived if the expert testifies at trial pursuant to agreement of the parties
124	Dr. Matthew Cooper’s Supplemental Report (To Be Supplemented Before Trial)	Hearsay, FRE 802; reserving objections for records not previously produced, Local Rule 16.1(c)(3); to the extent untimely, FRCP 26 & 37; the hearsay to the report is waived if the expert testifies at trial pursuant to agreement of the parties

125	Dr. Matthew Cooper's CV	Hearsay, FRE 802; reserving objections for records not previously produced, Local Rule 16.1(c)(3); the hearsay to the report is waived if the expert testifies at trial pursuant to agreement of the parties
126	Chad L. Staller's Report on Frank Mousser, Oct. 29, 2025	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; the hearsay objection to the expert witness report is waived if the expert testifies at trial pursuant to agreement of the Parties
127	Chad L. Staller's Rebuttal Report on Frank Mousser, Jan. 20, 2026	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; the hearsay objection to the expert witness report is waived if the expert testifies at trial pursuant to agreement of the Parties
128	Chad L. Staller's Supplemental Report on Frank Mousser (To Be Supplemented Before Trial)	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; the hearsay objection to the expert witness report is waived if the expert testifies at trial pursuant to agreement of the Parties; reserving objections for records not previously produced, Local Rule 16.1(c)(3)
129	Chad L. Staller's Damages Checklist on Frank Mousser	Hearsay, FRE 802

130	Chad L. Staller's CV	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; the hearsay objection to the expert witness report is waived if the expert testifies at trial pursuant to agreement of the Parties
131	Michael Fryar's Cost Analysis for Frank Mousser 1/28/2025	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; the hearsay objection to the expert witness report is waived if the expert testifies at trial pursuant to agreement of the Parties
132	Michael Fryar's Supplemental Cost Analysis for Frank Mousser (To Be Supplemented Before Trial)	Reserving objections for records not previously produced, Local Rule 16.1(c)(3); to the extent untimely, FRCP 26 & 37
133	Michael Fryar's CV	Hearsay, FRE 802; expert opinions unhelpful and unreliable, FRE 702 & 703; the hearsay objection to the expert witness report is waived if the expert testifies at trial pursuant to agreement of the Parties
134	Damages Assessment Form for Frank Mousser	Impermissibly broad, FRCP 26
135	Rule 1006 Summary of Medical Expenses for Frank Mousser	Reserving objections for records not previously produced, Local Rule 16.1(c)(3)
136	Excerpts from Deposition Transcript of Daniel Clarke, Designated Pursuant to Local Civil Rule 16.1(c)(4)	Objections noted separately
137	Excerpts from Deposition Transcript of Heather Ford, Designated Pursuant to Local Civil Rule 16.1(c)(4)	Objections noted separately

138	Excerpts from Deposition Transcript of Wang Ji, Designated Pursuant to Local Civil Rule 16.1(c)(4)	Objections noted separately
139	Excerpts from Deposition Transcript of Andrew McIlroy, Designated Pursuant to Local Civil Rule 16.1(c)(4)	Objections noted separately
140	Excerpts from Deposition Transcript of Henry Miller, Designated Pursuant to Local Civil Rule 16.1(c)(4)	Objections noted separately
141	Excerpts from Deposition Transcript of Janine Piper, Designated Pursuant to Local Civil Rule 16.1(c)(4)	Objections noted separately
142	Excerpts from Deposition Transcript of Tricia Yount, Designated Pursuant to Local Civil Rule 16.1(c)(4)	Objections noted separately
<u>Miscellaneous Exhibits</u>		
	Any document cited on an expert's Materials Considered List, or any supplement to an expert's Materials Considered List	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)
	Any document marked as an exhibit during any deposition in the Camp Lejeune Water Litigation	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)
	Any document cited or referenced in any expert's report	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)
	Any exhibits listed by Defendant	
	Enlargements of any exhibit identified by any party	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)
	Rebuttal exhibits	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)

	Impeachment and/or cross-examination exhibits	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)
	Deposition transcripts, discovery responses and/or pleadings used for impeachment	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)
	Demonstrative and illustrative exhibits	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)
	Any exhibits created in the courtroom to illustrate witness testimony	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)
	Any chart, figure or table from any PLG expert report	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3)
	Supplementations to any PLG expert report	Unidentifiable, FRCP 26(a)(3)(iii); reserving objections for records not previously produced, Local Rule 16.1(c)(3); to the extent untimely, FRCP 26 & 37

B. The United States

Ex. #	TITLE	BATES RANGE	PLG'S OBJECTION
Phase I Trial Exhibits			
1.	Intentionally Blank		
2.	Intentionally Blank		
3.	Victor Melts Deposition Transcript dated April 12,	CLJA_WATERMODELING_01-09_0000039015 - 9090	Fed. R. Civ. P. 32(a)(1); Fed. R. Evid.

	2001		402, 403, 802 .
4.	1962 Camp Lejeune Base Guide	Base_Guides_0000000077 - 97	Fed. R. Evid. 402, 403, 802.
5.	1966 Camp Lejeune Base Guide	Base_Guides_0000000098 - 179	Fed. R. Evid. 402, 403, 802.
6.	1977 Camp Lejeune Base Guide	Base_Guides_0000000627 - 94	Fed. R. Evid. 402, 403, 802.
7.	1978 Camp Lejeune Base Guide	Base_Guides_0000000695 - 758	Fed. R. Evid. 402, 403, 802.
8.	1979 Camp Lejeune Base Guide	Base_Guides_0000000759 - 828	Fed. R. Evid. 402, 403, 802.
9.	1980 Camp Lejeune Base Guide	Base_Guides_0000000829 - 70	Fed. R. Evid. 402, 403, 802.
10.	1984 Camp Lejeune Base Guide	Base_Guides_0000000871 - 922	Fed. R. Evid. 402, 403, 802.
11.	1988 Camp Lejeune Base Guide	Base_Guides_0000000923 - 81	Fed. R. Evid. 402, 403, 802.
12.	1953 Jacksonville, North Carolina Telephone Directory	BRIGHAM_USA_0000000010 - 13	Fed. R. Evid. 402, 403, 802.
13.	Intentionally Blank		
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15.	1960 Jacksonville, North Carolina Telephone Directory	BRIGHAM_USA_00000000189 - 91	Fed. R. Evid. 402, 403, 802.
16.	Semper Fidelis, A Brief History of Onslow County, North Carolina and Marine Corps Base, Camp Lejeune	BRIGHAM_USA_0000008862 - 985	Fed. R. Evid. 402, 403, 802.
17.	The Devilpup, Volume Five by Camp Lejeune High School, Marine Corps Base, Camp Lejeune, N.C. dated 1954	BRIGHAM_USA_0000041226 - 337	Fed. R. Evid. 402, 403, 802, 803.
18.	State of North Carolina Leasing Records of ABC One-Hour Cleaners dated September 16, 1964	CLJA_EPA01-0000221397 - 421	Fed. R. Evid. 402, 403, 802.
19.	Utility Study for Courthouse Bay, Camp Lejeune North Carolina by J.E. Serrine Company (January 31, 1979)	CLJA_USMC_CAGE_00002005 92 - 1257	
20.	Special Training Analysis, Camp Lejeune, North Carolina (April 1986)	CLJA_USMCGEN_0000027381 - 586	
21.	Intentionally Blank		
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24.	Comprehensive Ground Water Monitoring Evaluation of ABC 1 Hour Cleaners by North Carolina Department of	CLJA_USMCGEN_0000312358 - 71	Fed. R. Evid. 402, 403, 802, 803.

	Human Resources, Division of Health Services (April 20, 1989)		
25.	Site Inspection Report of ABC One Hour Cleaners by Cheryl A. McMorris of the NC Solid and Hazardous Waste Management Branch of the Environmental Health Section's CERCLA Unit (May 27, 1987)	CLJA_USMCGEN_0000312406 - 510	Fed. R. Evid. 402, 403, 802, 803.
26.	1986 Camp Lejeune Base Master Plan	CLJA_USMCGEN_0000326502-327617	
27.	1970 Camp Lejeune Base Master Plan	CLJA_USMCGEN_0000336978 - 337167	
28.	Assessment of Hydrologic and Hydrogeologic Data at Camp Lejeune Marine Corps Base (Report 89-4096) (1989)	CLJA_WATERMODELING_01-0000131765 - 832	
29.	Historic Water Distribution 1941- 2000 Composite Produced	CLJA_WATERMODELING_01_0000190491-503	
30.	Proposed Assessment and Notice of Continuing Penalties by North Carolina Environmental Management Commission, File No. GW 86-01	CLJA_WATERMODELING_07-0001289853 - 61	
31.	Field Water Supply & Water Purification Equipment	CLJA_WATERMODELING_07-0001368605 - 9539	
32.	Map of Camp Lejeune and Raleigh, NC, Composite Map of Camp Lejeune Water Treatment Plants	Dkt. No. 335.1 (Ex. 1)	
33.	Jacksonville, NC <i>Daily News</i> (June 29, 1954)	CLJA_OCPL_0000000001 - 12	Fed. R. Evid. 402, 403, 802, 803.
34.	Camp Lejeune, NC Completion Report Vol. I (April 15, 1941 – September 30, 1942)	CLJA_USMCGEN_0000287341 - 7705	Fed. R. Evid. 402, 403, 802.
35.	Camp Lejeune, NC Completion Report Vol. II (April 15, 1941 – September 30, 1942)	CLJA_USMCGEN_0000161226 - 1951	Fed. R. Evid. 402, 403, 802.
36.	Camp Lejeune, NC Completion Report Vol. III (October 1, 1942 – December 18, 1943)	CLJA_USMCGEN_0000209879 - 10275	Fed. R. Evid. 402, 403, 802.
37.	The Globe dated January 22, 1959	BRIGHAM_USA_0000013638 - 49	Fed. R. Evid. 402, 403, 802, 803.

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42.	Expert Report of Jay L. Brigham, Ph.D. dated December 9, 2024		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
43.	Curriculum Vitae of Jay L. Brigham, Ph.D.		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
44.	Errata to December 9, 2024 Expert Report of Jay L. Brigham, Ph.D.		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
45.	Expert Report of Jay L. Brigham, Ph.D. dated February 7, 2025		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
46.	Reliance Materials of Jay L. Brigham, Ph.D. for December 9, 2024 Expert Report, Attachment A		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
47.	Reliance Materials of Jay L. Brigham, Ph.D. for December 9, 2024 Expert Report, Attachment B		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
48.	Reliance Materials of Jay L. Brigham, Ph.D. for December 9, 2024 Expert Report, Attachment C		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
49.	Reliance Materials of Jay L. Brigham, Ph.D. for February 7, 2025 Expert Report		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is

			subject to cross-examination at trial)
50.	Expert Report of Ari Kelman, Ph.D. dated February 7, 2025		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
51.	Curriculum Vitae of Ari Kelman, Ph.D		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
52.	Reliance Materials of Ari Kelman, Ph.D. for February 7, 2025 Expert Report		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
53.	Expert Report of Alex Spiliotopoulos, Ph.D.		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
54.	Expert Report of Remy Hennet, Ph.D.		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
55.	Curriculum Vitae of Alex Spiliotopoulos, Ph.D.		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
56.	Curriculum Vitae of Remy Hennet, Ph.D.		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
57.	Reliance List of Alex Spiliotopoulos, Ph.D.		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)

58.	Reliance List of Remy Hennet, Ph.D.		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
59.	Supplemental and Corrected Reliance Lists of Alex Spiliotopoulos, Ph.D.		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
60.	Supplemental and Corrected Reliance Lists of Remy Hennet, Ph.D.		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
61.	2005 ATSDR Expert Panel Summary	CLJA_WATERMODELING_01-0000018341 - 430	
62.	2009 ATSDR Expert Panel Summary	CLJA_WATERMODELING_05-0000783839 - 996	
63.	3.28.2005 ATSDR Expert Panel Transcript	CLJA_WATERMODELING_01-09-0000001845 – 2046	
64.	3.29.2005 ATSDR Expert Panel Transcript	CLJA_WATERMODELING_01-0000064462 - 663	
65.	4.29.2009 ATSDR Expert Panel Transcript	CLJA_WATERMODELING_01-0000011258 - 600	
66.	4.30.2009 ATSDR Expert Panel Transcript	CLJA_WATERMODELING_01-0000011601 - 877	
67.	May 2007 Government Accountability Office Report regarding Camp Lejeune	CLJA_HEALTHEFFECTS-0000073571 - 651	
68.	ATSDR Tarawa Terrace Water Model, Executive Summary	CLJA_WATERMODELING_01-0000775401 - 420	
69.	ATSDR Tarawa Terrace Water Model, Chapter A Report	CLJA_WATERMODELING_09-0000615638 - 5753	
70.	Intentionally Blank		
71.	ATSDR Tarawa Terrace Water Model, Chapter C Report	CLJA_WATERMODELING_01-0000092939 - 93046	
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74.	ATSDR Tarawa Terrace Water Model, Chapter F Report	CLJA_WATERMODELING_01-0000093047 - 93114	
75.	Intentionally Blank		
76.	ATSDR Tarawa Terrace	CLJA_WATERMODELING_01-	

	Water Model, Chapter H Report	0000768339 - 398	
77.	ATSDR Tarawa Terrace Water Model, Chapter I Report	CLJA_WATERMODELING_01-0000768339 - 398	
78.	Intentionally Blank		
79.	Feb. 2007 Letter from M. Maslia and R. Faye to L. Konikow	CL_PLG-EXPERT_KONIKOW_0000000006 - 21	Fed. R. Evid. 402, 403, 802
80.	Jan. 12, 2007 ATSDR Water Modeling Team Email Exchange	CLJA_ATSDR_BOVE-0000158108 - 109	Fed. R. Evid. 402, 403, 802
81.	Jan. 13, 2007 Email from R. Faye to M. Maslia	CLJA_WATERMODELING_01-0000075306 - 307	Fed. R. Evid. 402, 403, 802
82.	Jun. 19, 2008 Navy Letter to ATSDR	CLJA_WATERMODELING_01-00000486488 - 495	
83.	2009 ATSDR Response to Navy Letter	CLJA_WATERMODELING_01-09-0000033263 - 326	
84.	2009 NRC Report on Camp Lejeune	CLJA_HEALTHEFFECTS-0000000431 - 769	Fed. R. Evid. 402, 403, 802
85.	"Complexities in Hindcasting Models – When Should We Say Enough Is Enough?" by T. Prabhakar Clement (2010)	CLJA_ATSDR_BOVE-0000048193 - 202	Fed. R. Evid. 402, 403, 802, 803.
86.	Sept. 26, 2011 Email from B. Anderson to M. Maslia and M. Aral	CLJA_WATERMODELING_05-0000021184 - 86	Fed. R. Evid. 402, 403, 802
87.	Jan. 16, 2013 Letter from C. Portier to A. Hickey	CLJA_WATERMODELING_01-0000076158 - 59	
88.	Aug. 3, 2015 VA Press Release re Camp Lejeune Presumptions	CLJA_WATERMODELING_01-0000005179 - 5180	Fed. R. Evid. 402, 403, 802, 803.
89.	Transcript from Congressional Hearing on Camp Lejeune, Jun. 12, 2007	CH0000015957 - 16362	
90.	ATSDR Hadnot Point/Holcomb Boulevard Water Model, Chapter A Report	CLJA_WATERMODELING_01-0000942579 - 2788	
91.	ATSDR Hadnot Point/Holcomb Boulevard Water Model, Chapter A, Supplement 1 Report	CLJA_WATERMODELING_05-0000782151 - 2268	
92.	Intentionally Blank		
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96.	ATSDR Hadnot Point/Holcomb Boulevard Water Model, Chapter A,	CLJA_WATERMODELING_05-0000783320 - 394	

	Supplement 6 Report		
97.	Intentionally Blank		
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102.	ATSDR Camp Lejeune Public Health Assessment, Aug. 4, 1997	CLJA_UST02-0000843893 - 3994	
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118.	AH Environmental Report, Dec. 2004	CLJA_WATERMODELING_01-0000071446 – 512	
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<u>Phase II Trial Exhibits</u>			
221.	Kidney Cancer Expert Report of Julie E. Goodman, Ph.D.		<p>Objection — Fed. R. Evid. 702, 703, 402, 403. Dr. Goodman’s opinions are subject to PLG’s pending Mot. to Exclude Dr. Goodman [D.E. 621].</p> <p>Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)</p>
222.	Supplemental Materials Considered List of Julie E. Goodman, Ph.D. – February 7, 2026		Objection — Fed. R. Evid. 702, 703, 402, 403. Dr. Goodman’s underlying opinions, on

			<p>which this list bears, are subject to PLG's pending Mot. to Exclude Dr. Goodman [D.E. 621].</p> <p>Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)</p>
223.	Supplemental Materials Considered List of Julie E. Goodman, Ph.D. – Kidney Cancer – May 19, 2026		<p>Objection — Fed. R. Evid. 702, 703, 402, 403. Dr. Goodman's underlying opinions, on which this list bears, are subject to PLG's pending Mot. to Exclude Dr. Goodman [D.E. 621].</p> <p>Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)</p>
224.	Bladder Cancer Expert Report of Julie E. Goodman, Ph.D.		<p>Objection — Fed. R. Evid. 702, 703, 402, 403. Dr. Goodman's opinions are subject to PLG's pending Mot. to Exclude Dr. Goodman [D.E. 621].</p> <p>Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)</p>
225.	Supplemental Materials Considered List of Julie E. Goodman, Ph.D. – Bladder Cancer – May 19, 2026		<p>Objection — Fed. R. Evid. 702, 703, 402, 403. Dr. Goodman's underlying opinions, on which this list bears, are subject to PLG's pending Mot. to Exclude Dr. Goodman [D.E. 621].</p>

			Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
226.	Expert Report of Peter G. Shields, M.D.		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
227.	Supplemental Materials Considered List of Peter G. Shields, M.D., – May 19, 2026		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
228.	Kidney Cancer Expert Report of Michael J. McCabe, Jr., Ph.D.		Objection — Fed. R. Evid. 702, 703, 402, 403. Dr. McCabe’s opinions are subject to PLG’s pending Mot. to Exclude Dr. McCabe [D.E. 597]. Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
229.	Supplemental Materials Considered List Michael J. McCabe, Jr., Ph.D., – May 19, 2026		Objection — Fed. R. Evid. 702, 703, 402, 403. Dr. McCabe’s underlying opinions, on which this list bears, are subject to PLG’s pending Mot. to Exclude Dr. McCabe [D.E. 597]. Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
230.	ERRATA – Expert Reports of		Objection — Fed. R.

	Michael J. McCabe Jr., Ph.D.		Evid. 702, 703, 402, 403. Errata to reports whose opinions are subject to PLG's pending Mot. to Exclude Dr. McCabe [D.E. 597]. Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
231.	Bladder Cancer Expert Report of Michael J. McCabe, Jr., Ph.D.		Objection — Fed. R. Evid. 702, 703, 402, 403. Dr. McCabe's opinions are subject to PLG's pending Mot. to Exclude Dr. McCabe [D.E. 597]. Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
232.	Expert Report of John C. Lipscomb, Ph.D.		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
233.	Supplemental Expert Report of John C. Lipscomb, Ph.D.		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
234.	Supplemental Materials Considered List Dr. Lipscomb – May 19, 2026		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
235.	National Research Council (U.S.). Committee on Contaminated Drinking Water at Camp Lejeune. (2009).	CLJA_HEALTHEFFECTS-0000000431 - CLJA_HEALTHEFFECTS-0000000769	

	<i>Contaminated Water Supplies at Camp Lejeune: Assessing Potential Health Effects.</i> National Academies Press. https://doi.org/10.17226/12618 .		
236.	Bove, F.J.; Ruckart, P.Z.; Maslia, M.; Larson, T.C. (2014a). Evaluation of mortality among marines and navy personnel exposed to contaminated drinking water at USMC base Camp Lejeune: a retrospective cohort study. <i>Environ. Health</i> , 13, 10. doi:10.1186/1476-069X-13-10.	CLJA_HEALTHEFFECTS-0000692651 - CLJA_HEALTHEFFECTS-0000692664	
237.	Bove, F.J.; Ruckart, P.Z.; Maslia, M.; Larson, T.C. (2014b). Mortality study of civilian employees exposed to contaminated drinking water at USMC Base Camp Lejeune: A retrospective cohort study. <i>Environ. Health</i> 13, 68. doi: 10.1186/1476-069X-13-68.	CLJA_HEALTHEFFECTS-0000000393 - CLJA_HEALTHEFFECTS-0000000405	
238.	Agency for Toxic Substances and Disease Registry (ATSDR). (2017a). ATSDR Assessment of the Evidence for the Drinking Water Contaminants at Camp Lejeune and Specific Cancers and Other Diseases. January 13, 2017.	CLJA_HEALTHEFFECTS-0000044276 - CLJA_HEALTHEFFECTS-0000044427	
239.	Agency for Toxic Substances and Disease Registry (ATSDR). (2017b). Public Health Assessment Camp Lejeune Drinking Water, U.S. Marine Corps Base Camp Lejeune, North Carolina. January 20, 2017.	CLJA_HEALTHEFFECTS-0000000011 - CLJA_HEALTHEFFECTS-0000000212	
240.	Agency for Toxic Substances and Disease Registry (ATSDR). (2018). Morbidity Study of Former Marines, Employees, and Dependents	CLJA_HEALTHEFFECTS-0000000214 - CLJA_HEALTHEFFECTS-0000000340	

	Potentially Exposed to Contaminated Drinking Water at U.S. Marine Corps Base Camp Lejeune. April 2018.		
241.	Bove, F.J.; Greek, A.; Gatiba, R.; Boehm, R.C.; Mohnsen, M.M. (2024a). Evaluation of mortality among Marines, Navy personnel, and civilian workers exposed to contaminated drinking water at USMC base Camp Lejeune: A cohort study. <i>Environ. Health</i> 23(1), 61. doi: 10.1186/s12940-024-01099-7.	CLJA_HEALTHEFFECTS-0000109294 - CLJA_HEALTHEFFECTS-0000109392	
242.	Bove, F.J.; Greek A.; Gatiba, R.; Kohler, B.; Sherman, R.; Shin, G.T.; Bernstein, A. (2024b). 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. <i>Environ. Health Perspect.</i> 132(10), 107008. doi: 10.1289/EHP14966.		
<u>Plaintiff-Specific Exhibits</u>			
243.	April 23, 2024 Letter from Department of Veterans Affairs	00667_Mousser_VHA_001	
244.	October 23, 2020 VHA Discharge Summary	00667_Mousser_VHA_0019-0021	
245.	April 8, 2024 VHA No Show Note	00667_Mousser_VHA_0026	
246.	April 5, 2024 VHA Mental Health Secure Messaging	00667_Mousser_VHA_0027	
247.	March 20, 2024 VHA Team Conference Note	00667_Mousser_VHA_0029	
248.	March 18, 2024 VHA Primary Care Note	00667_Mousser_VHA_0030-0033	
249.	March 18, 2024 VHA Mental Health Diagnostic Study Note	00667_Mousser_VHA_0035-0036	
250.	March 18, 2024 VHA Telehealth Note	00667_Mousser_VHA_0037-0043	
251.	February 8, 2024 VHA Primary Care Note	00667_Mousser_VHA_0045-0049	

252.	February 8, 2024 VHA Medication Mgt Note	00667_Mousser_VHA_0050-0054	
253.	February 8, 2024 VHA Physician Note	00667_Mousser_VHA_0055-0059	
254.	February 8, 2024 VHA Accounting of Disclosures Note	00667_Mousser_VHA_0060	
255.	February 8, 2024 VHA Primary Care Nursing Note	00667_Mousser_VHA_0061-0064	
256.	February 5, 2024 VHA Urology Secure Messaging	00667_Mousser_VHA_0066	
257.	January 30, 2024 VHA Primary Care Note	00667_Mousser_VHA_0067-0071	
258.	January 29, 2024 VHA Telehealth Consult	00667_Mousser_VHA_0072-0079	
259.	January 22, 2024 VHA Mental Health Diagnostic Study Note	00667_Mousser_VHA_0081-0082	
260.	January 4, 2024 VHA NonVA Note	00667_Mousser_VHA_0083	
261.	December 27, 2023 VHA Administrative Note	00667_Mousser_VHA_0085-0086	
262.	December 27, 2023 VHA Mental Health Outpatient Note	00667_Mousser_VHA_0087-0094	
263.	December 21, 2023 VHA No Show Note	00667_Mousser_VHA_0095	
264.	December 15, 2023 VHA Nephrology Note	00667_Mousser_VHA_0097-00103	
265.	December 15, 2023 VHA Nephrology Note	00667_Mousser_VHA_00104-00108	
266.	December 15, 2023 VHA Nursing Note	00667_Mousser_VHA_00109-00110	
267.	December 11, 2023 VHA Nephrology Consult	00667_Mousser_VHA_00111-00112	
268.	December 8, 2023 VHA MHV Dialog Note	00667_Mousser_VHA_00113-00114	
269.	December 6, 2023 VHA Administrative Note	00667_Mousser_VHA_00116	
270.	December 5, 2023 VHA Mental Health Outpatient Note	00667_Mousser_VHA_00117-00123	
271.	December 1, 2023 VHA MHV Dialog Note	00667_Mousser_VHA_00126	
272.	November 21, 2023 VHA Primary Care Education Note	00667_Mousser_VHA_00128	
273.	November 21, 2023 VHA Primary Care Note	00667_Mousser_VHA_00129-00133	
274.	November 17, 2023 VHA Telephone Encounter Note	00667_Mousser_VHA_00134	
275.	November 17, 2023 VHA Primary Care Nursing Note	00667_Mousser_VHA_00135-00138	
276.	November 17, 2023 VHA	00667_Mousser_VHA_00139-	

	Physician Note	00143	
277.	November 16, 2023 VHA Primary Care Telephone Encounter Note	00667_Mousser_VHA_00144-00145	
278.	October 5, 2023 VHA Letters	00667_Mousser_VHA_00146-00147	
279.	October 4, 2023 VHA Eye Consult	00667_Mousser_VHA_00148	
280.	October 4, 2023 VHA Optometry Note	00667_Mousser_VHA_00149	
281.	October 4, 2023 VHA Eye Note	00667_Mousser_VHA_00150-00156	
282.	October 4, 2023 VHA Eye Note	00667_Mousser_VHA_00157-00158	
283.	October 4, 2023 VHA NonVA Note	00667_Mousser_VHA_00159	
284.	October 4, 2023 VHA Letters	00667_Mousser_VHA_00160-00161	
285.	October 2, 2023 VHA NonVA Note	00667_Mousser_VHA_00162	
286.	September 11, 2023 VHA NonVA Note	00667_Mousser_VHA_00163-00164	
287.	August 1, 2023 VHA Optometry Note	00667_Mousser_VHA_00167	
288.	July 27, 2023 VHA Primary Care Note	00667_Mousser_VHA_00169-00173	
289.	July 27, 2023 VHA Physician Note	00667_Mousser_VHA_00174-00177	
290.	July 27, 2023 VHA Primary Care Nursing Note	00667_Mousser_VHA_00178-00184	
291.	July 24, 2023 VHA Pharmacy Note	00667_Mousser_VHA_00185-00188	
292.	July 18, 2023 VHA NonVA Note	00667_Mousser_VHA_00189	
293.	July 18, 2023 VHA Letters	00667_Mousser_VHA_00190-00191	
294.	April 17, 2023 VHA Pharmacy Note	00667_Mousser_VHA_00194-00198	
295.	March 20, 2023 VHA Pharmacy Note	00667_Mousser_VHA_00199-203	
296.	March 15, 2023 VHA Letters	00667_Mousser_VHA_00205-00206	
297.	March 14, 2023 VHA Letters	00667_Mousser_VHA_00207-00208	
298.	March 7, 2023 VHA NonVA Note	00667_Mousser_VHA_00209-00210	
299.	February 13, 2023 VHA Pharmacy Note	00667_Mousser_VHA_00215-00219	
300.	January 17, 2023 VHA Physician Note	00667_Mousser_VHA_00225-00230	

301.	January 17, 2023 VHA Primary Care Note	00667_Mousser_VHA_00231- 00235	
302.	January 17, 2023 VHA Primary Care Nursing Note	00667_Mousser_VHA_00236- 00239	
303.	December 25, 2022 VHA Physician Emergency Dept Note	00667_Mousser_VHA_00240- 00241	
304.	December 25, 2022 VHA Emergency Dept Discharge Plan	00667_Mousser_VHA_00242- 00243	
305.	December 25, 2022 VHA Accounting of Disclosures Note	00667_Mousser_VHA_00244	
306.	December 25, 2022 VHA Medication Mgt Note	00667_Mousser_VHA_00245- 00246	
307.	December 25, 2022 VHA Emergency Dept E&M Note	00667_Mousser_VHA_00247- 00251	
308.	December 19, 2022 VHA Urology Telephone Encounter Note	00667_Mousser_VHA_00257	
309.	December 12, 2022 VHA Sleep Medicine Note	00667_Mousser_VHA_00258- 00260	
310.	November 15, 2022 VHA Respiratory Therapy Consult	00667_Mousser_VHA_00261- 00262	
311.	September 27, 2022 VHA E&M Note	00667_Mousser_VHA_00263	
312.	September 23, 2022 VHA Letters	00667_Mousser_VHA_00264- 00265	
313.	September 23, 2022 VHA MHV Dialog Note	00667_Mousser_VHA_00266- 00269	
314.	September 22, 2022 VHA MHV Dialog Note	00667_Mousser_VHA_00270- 00271	
315.	September 22, 2022 VHA Urology Secure Messaging	00667_Mousser_VHA_00272- 00273	
316.	September 21, 2022 VHA Letters	00667_Mousser_VHA_00274- 00275	
317.	September 19, 2022 VHA Consent Form	00667_Mousser_VHA_00277- 00278	
318.	September 19, 2022 VHA Consent Form	00667_Mousser_VHA_00279- 00280	
319.	September 19, 2022 VHA Consent Form	00667_Mousser_VHA_00281- 00282	
320.	September 19, 2022 VHA Nursing Note	00667_Mousser_VHA_00283	
321.	September 19, 2022 VHA Urology Procedure Note	00667_Mousser_VHA_00284- 00287	
322.	September 12, 2022 VHA Letters	00667_Mousser_VHA_00288- 00289	
323.	September 12, 2022 VHA Urology Secure Messaging	00667_Mousser_VHA_00290- 00291	

324.	September 12, 2022 VHA MHV Dialog Note	00667_Mousser_VHA_00292	
325.	September 6, 2022 VHA NonVA Note	00667_Mousser_VHA_00293	
326.	September 6, 2022 VHA Letters	00667_Mousser_VHA_00294-00295	
327.	September 1, 2022 VHA NonVA Note	00667_Mousser_VHA_00296	
328.	August 31, 2022 NonVA Consult	00667_Mousser_VHA_00297-00298	
329.	August 18, 2022 VHA Letters	00667_Mousser_VHA_00299-00300	
330.	August 17, 2022 VHA Urology Secure Messaging	00667_Mousser_VHA_00301	
331.	July 29, 2022 VHA Urology Secure Messaging	00667_Mousser_VHA_00303-00304	
332.	July 29, 2022 VHA Urology Secure Messaging	00667_Mousser_VHA_00305	
333.	July 27, 2022 VHA Letters	00667_Mousser_VHA_00306-00307	
334.	July 20, 2022 VHA Primary Care Note	00667_Mousser_VHA_00308-00311	
335.	July 20, 2022 VHA Physician Note	00667_Mousser_VHA_00312-00317	
336.	July 20, 2022 VHA Primary Care Nursing Note	00667_Mousser_VHA_00318-00326	
337.	July 19, 2022 VHA Nephrology Note	00667_Mousser_VHA_00327-00333	
338.	July 19, 2022 VHA Nephrology Note	00667_Mousser_VHA_00334-00338	
339.	July 19, 2022 VHA Nursing Note	00667_Mousser_VHA_00339	
340.	July 15, 2022 VHA Nursing Note	00667_Mousser_VHA_00340-00341	
341.	July 14, 2022 VHA Optometry Note	00667_Mousser_VHA_00342	
342.	July 14, 2022 VHA Eye Note	00667_Mousser_VHA_00343-00347	
343.	July 14, 2022 VHA Eye Note	00667_Mousser_VHA_00348-00349	
344.	July 8, 2022 VHA Primary Care Telephone Encounter Note	00667_Mousser_VHA_00352-00353	
345.	June 30, 2022 VHA No Show Note	00667_Mousser_VHA_00354	
346.	June 15, 2022 VHA Pulmonary Note	00667_Mousser_VHA_00357	
347.	June 9, 2022 VHA Primary Care Note	00667_Mousser_VHA_00358-00361	
348.	June 9, 2022 VHA Telehealth	00667_Mousser_VHA_00362-	

	Note	00366	
349.	April 26, 2022 VHA Pharmacy Telephone Encounter Note	00667_Mousser_VHA_00369-00371	
350.	April 25, 2022 VHA Telephone Encounter Note	00667_Mousser_VHA_00372	
351.	April 25, 2022 VHA MHV Dialog Note	00667_Mousser_VHA_00373	
352.	April 21, 2022 VHA NonVA Note	00667_Mousser_VHA_00374	
353.	April 18, 2022 VHA Urology Telephone Encounter Note	00667_Mousser_VHA_00375	
354.	April 8, 2022 VHA Nephrology Telephone Encounter Note	00667_Mousser_VHA_00376-00377	
355.	March 24, 2022 VHA Telephone Encounter Note	00667_Mousser_VHA_00378	
356.	March 21, 2022 VHA Consent Form	00667_Mousser_VHA_00380-00381	
357.	March 21, 2022 VHA Nursing Note	00667_Mousser_VHA_00382-00383	
358.	March 21, 2022 VHA Urology Procedure Note	00667_Mousser_VHA_00384-00386	
359.	March 15, 2022 VHA Mental Health Outpatient Note	00667_Mousser_VHA_00387-00391	
360.	March 15, 2022 VHA MHV Dialog Note	00667_Mousser_VHA_00392-00393	
361.	March 15, 2022 VHA Letters	00667_Mousser_VHA_00394-00396	
362.	March 8, 2022 VHA Nephrology Telephone Encounter Note	00667_Mousser_VHA_00397-00399	
363.	March 8, 2022 VHA MHV Dialog Note	00667_Mousser_VHA_00400	
364.	March 4, 2022 VHA Letters	00667_Mousser_VHA_00401-00402	
365.	March 4, 2022 VHA Psychology Group Counseling Note	00667_Mousser_VHA_00403-00404	
366.	February 25, 2022 VHA Psychology Group Counseling Note	00667_Mousser_VHA_00405-00406	
367.	February 18, 2022 VHA Telephone Encounter Note	00667_Mousser_VHA_00407	
368.	February 2, 2022 VHA No Show Note	00667_Mousser_VHA_00409	
369.	January 31, 2022 VHA Letters	00667_Mousser_VHA_00410	
370.	January 19, 2022 VHA Mental Health Outpatient Note	00667_Mousser_VHA_00411-0416	
371.	January 11, 2022 VHA	00667_Mousser_VHA_00417-	

	Nephrology Note	00422	
372.	January 11, 2022 VHA Nephrology Note	00667_Mousser_VHA_00423-00427	
373.	January 11, 2022 VHA Nursing Note	00667_Mousser_VHA_00428-00429	
374.	January 6, 2022 VHA NonVA Note	00667_Mousser_VHA_00430-00431	
375.	December 30, 2022 VHA Telephone Encounter Note	00667_Mousser_VHA_00432	
376.	December 14, 2022 VHA Pharmacy Telephone Encounter Note	00667_Mousser_VHA_00434	
377.	December 7, 2021 VHA Mental Health Outpatient Note	00667_Mousser_VHA_00437-00441	
378.	December 2, 2022 VHA Mental Health Outpatient Note	00667_Mousser_VHA_00442-00447	
379.	November 26, 2021 VHA Primary Care Note	00667_Mousser_VHA_00448-00452	
380.	November 26, 2021 VHA Pharmacy Telephone Encounter Note	00667_Mousser_VHA_00453-00456	
381.	November 22, 2021 VHA NonVA Note	00667_Mousser_VHA_00457	
382.	November 22, 2021 VHA Mental Health Outpatient Note	00667_Mousser_VHA_00460-00465	
383.	November 9, 2021 VHA Mental Health Outpatient Note	00667_Mousser_VHA_00466-0470	
384.	November 8, 2021 VHA Mental Health Secure Messaging	00667_Mousser_VHA_00471-0472	
385.	September 20, 2021 VHA Consent Form	00667_Mousser_VHA_00475-00476	
386.	September 20, 2021 VHA Urology Procedure Note	00667_Mousser_VHA_00477-0480	
387.	September 20, 2021 VHA Nursing Note	00667_Mousser_VHA_00481-00482	
388.	August 10, 2021 VHA Nephrology Consult	00667_Mousser_VHA_00483-00488	
389.	August 10, 2021 VHA Nephrology Note	00667_Mousser_VHA_00489-00493	
390.	August 10, 2021 VHA Nursing Note	00667_Mousser_VHA_00495	
391.	August 9, 2021 VHA Primary Care Note	00667_Mousser_VHA_00496-00499	
392.	August 9, 2021 VHA Pain Outpatient Note	00667_Mousser_VHA_00500-00504	
393.	August 9, 2021 VHA Accounting of Disclosures Note	00667_Mousser_VHA_00505	
394.	July 19, 2021 VHA Mental	00667_Mousser_VHA_00506	

	Health Secure Messaging		
395.	July 16, 2021 VHA Administrative Note	00667_Mousser_VHA_00507	
396.	July 1, 2021 VHA Letters	00667_Mousser_VHA_00509-00511	
397.	June 30, 2021 VHA Urology Telephone Encounter Note	00667_Mousser_VHA_00512-00513	
398.	June 21, 2021 VHA Mental Health Secure Messaging	00667_Mousser_VHA_00514	
399.	June 18, 2021 VHA Pharmacy Consult	00667_Mousser_VHA_00515	
400.	June 17, 2021 VHA Primary Care Note	00667_Mousser_VHA_00516-00520	
401.	June 17, 2021 VHA Medication Mgt Note	00667_Mousser_VHA_00521-00522	
402.	June 17, 2021 VHA Pain Initial Evaluation Note	00667_Mousser_VHA_00523-00527	
403.	June 17, 2021 VHA Accounting of Disclosures Note	00667_Mousser_VHA_00528	
404.	June 17, 2021 VHA Nursing Note	00667_Mousser_VHA_00530	
405.	June 14, 2021 VHA Primary Care Note	00667_Mousser_VHA_00531-00534	
406.	June 14, 2021 VHA Telehealth Note	00667_Mousser_VHA_00535-00539	
407.	June 9, 2021 VHA MHV Dialog Note	00667_Mousser_VHA_00540	
408.	June 8, 2021 VHA Primary Care Consult	00667_Mousser_VHA_00542-00543	
409.	June 3, 2021 VHA Mental Health Outpatient Note	00667_Mousser_VHA_00544-00548	
410.	May 26, 2021 VHA MHV Dialog Note	00667_Mousser_VHA_00549	
411.	May 21, 2021 VHA Psychology Note	00667_Mousser_VHA_00550-00555	
412.	May 11, 2021 VHA MHV Dialog Note	00667_Mousser_VHA_00556	
413.	May 5, 2021 VHA Urology Procedure Note	00667_Mousser_VHA_00557-00560	
414.	May 5, 2021 VHA Consent Form	00667_Mousser_VHA_00561-00562	
415.	May 3, 2021 VHA Mental Health Secure Messaging	00667_Mousser_VHA_00564	
416.	April 9, 2021 VHA Telephone Encounter Note	00667_Mousser_VHA_00568	
417.	April 8, 2021 VHA Telephone Encounter Note	00667_Mousser_VHA_00569	
418.	April 5, 2021 VHA MHV Dialog Note	00667_Mousser_VHA_00570	

419.	March 30, 2021 VHA MHV Dialog Note	00667_Mousser_VHA_00571	
420.	March 26, 2021 VHA MHV Dialog Note	00667_Mousser_VHA_00572	
421.	March 26, 2021 VHA MHV Dialog Note	00667_Mousser_VHA_00573	
422.	March 26, 2021 VHA Accounting of Disclosures Note	00667_Mousser_VHA_00574	
423.	March 24, 2021 VHA MHV Dialog Note	00667_Mousser_VHA_00575-00576	
424.	February 3, 2021 VHA Consent Form	00667_Mousser_VHA_00580-00581	
425.	February 3, 2021 VHA Urology Procedure Note	00667_Mousser_VHA_00582-00587	
426.	January 11, 2021 VHA Mental Health Outpatient Note	00667_Mousser_VHA_00590-00593	
427.	January 8, 2021 VHA Primary Care Note	00667_Mousser_VHA_00595-00598	
428.	January 8, 2021 VHA Physician Note	00667_Mousser_VHA_00599	
429.	January 8, 2021 VHA Primary Care Nursing Note	00667_Mousser_VHA_00600-00602	
430.	January 5, 2021 VHA Physician Admission Evaluation Note	00667_Mousser_VHA_00603-00604	
431.	January 4, 2021 VHA MHV Dialog Note	00667_Mousser_VHA_00605	
432.	December 9, 2020 VHA Physician Admission Evaluation Note	00667_Mousser_VHA_00606-00607	
433.	November 13, 2020 VHA Medication Mgt Note	00667_Mousser_VHA_00608-00609	
434.	November 13, 2020 VHA Primary Care Telephone Encounter Note	00667_Mousser_VHA_00610-00611	
435.	November 13, 2020 VHA Accounting of Disclosures Note	00667_Mousser_VHA_00612	
436.	November 4, 2020 VHA Urology Note	00667_Mousser_VHA_00613-00615	
437.	October 27, 2020 VHA Primary Care Telephone Encounter Note	00667_Mousser_VHA_00617-00620	
438.	October 26, 2020 VHA Nursing Note	00667_Mousser_VHA_00624-00626	
439.	October 23, 2020 VHA Urology Note	00667_Mousser_VHA_00627	
440.	October 23, 2020 VHA Nursing Discharge Note	00667_Mousser_VHA_00628-00632	

441.	October 23, 2020 VHA Nursing Skin Assessment Note	00667_Mousser_VHA_00633	
442.	October 23, 2020 VHA Nursing note	00667_Mousser_VHA_00634	
443.	October 23, 2020 VHA Surgery Discharge Note	00667_Mousser_VHA_00635- 00641	
444.	October 23, 2020 VHA Medication Mgt Note	00667_Mousser_VHA_00642- 00643	
445.	October 23, 2020 VHA Urology Note	00667_Mousser_VHA_00644- 00645	
446.	October 22, 2020 VHA Nursing Inpatient Note	00667_Mousser_VHA_00646- 00651	
447.	October 22, 2020 VHA Urology Note	00667_Mousser_VHA_00652	
448.	October 22, 2020 VHA Urology Note	00667_Mousser_VHA_00653- 00654	
449.	October 22, 2020 VHA Nursing Note	00667_Mousser_VHA_00655	
450.	October 22, 2020 VHA Nursing Inpatient Note	00667_Mousser_VHA_00656- 00660	
451.	October 22, 2020 VHA Urology Note	00667_Mousser_VHA_00661	
452.	October 22, 2020 VHA Nursing Skin Assessment Note	00667_Mousser_VHA_00662	
453.	October 22, 2020 VHA Surgery Discharge Note	00667_Mousser_VHA_00663- 00666	
454.	October 22, 2020 VHA Medication Mgt Note	00667_Mousser_VHA_00669- 00670	
455.	October 22, 2020 VHA Accounting of Disclosures Note	00667_Mousser_VHA_00671	
456.	October 21, 2020 VHA Nursing Inpatient Note	00667_Mousser_VHA_00672- 00676	
457.	October 21, 2020 VHA Urology Note	00667_Mousser_VHA_00677- 00678	
458.	October 21, 2020 VHA Social Work Inpatient Note	00667_Mousser_VHA_00679- 00681	
459.	October 21, 2020 VHA Nursing Note	00667_Mousser_VHA_00682	
460.	October 21, 2020 VHA Nursing Inpatient Note	00667_Mousser_VHA_00683- 00687	
461.	October 21, 2020 VHA Nursing Operative Note	00667_Mousser_VHA_00688	
462.	October 21, 2020 VHA Urology Note	00667_Mousser_VHA_00689	
463.	October 21, 2020 VHA Nursing Skin Assessment Note	00667_Mousser_VHA_00690	

464.	October 21, 2020 VHA Pastoral Care Risk Assessment Screening Note	00667_Mousser_VHA_00691- 00692	
465.	October 21, 2020 VHA Nursing Note	00667_Mousser_VHA_00693	
466.	October 20, 2020 VHA Urology Note	00667_Mousser_VHA_00694	
467.	October 20, 2020 VHA Nursing Skin Assessment Note	00667_Mousser_VHA_00695- 00696	
468.	October 20, 2020 VHA Nursing Admission Evaluation Note	00667_Mousser_VHA_00697- 00701	
469.	October 20, 2020 VHA Nursing Inpatient Note	00667_Mousser_VHA_00702- 00708	
470.	October 20, 2020 VHA	00667_Mousser_VHA_00709- 00710	
471.	October 20, 2020 VHA Anesthesiology Operative Note	00667_Mousser_VHA_00711- 00712	
472.	October 20, 2020 VHA Post Operative E&M Note	00667_Mousser_VHA_00713	
473.	October 20, 2020 VHA Post Operative E&M Note	00667_Mousser_VHA_00714- 00716	
474.	October 20, 2020 VHA Anesthesiology Attending Pre Operative E&M Note	00667_Mousser_VHA_00717- 00719	
475.	October 20, 2020 VHA Pastoral Care Note	00667_Mousser_VHA_00720	
476.	October 20, 2020 VHA Nursing Operative Note	00667_Mousser_VHA_00721- 00722	
477.	October 20, 2020 VHA Nursing Operative Note	00667_Mousser_VHA_00723- 00728	
478.	October 20, 2020 VHA Nursing Operative Note	00667_Mousser_VHA_00729	
479.	October 20, 2020 VHA Nursing Note	00667_Mousser_VHA_00730- 00732	
480.	October 20, 2020 VHA Transplant Donor Evaluation Note	00667_Mousser_VHA_00733	
481.	October 20, 2020 VHA Nursing Skin Assessment Note	00667_Mousser_VHA_00736- 00737	
482.	October 20, 2020 VHA Fall Risk Assessment Note	00667_Mousser_VHA_00738- 00739	
483.	October 20, 2020 VHA Nursing Procedure Note	00667_Mousser_VHA_00740- 00744	
484.	October 19, 2020 VHA Telephone Encounter Note	00667_Mousser_VHA_00746- 00747	
485.	October 8, 2020 VHA Nursing	00667_Mousser_VHA_00749-	

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486.	October 8, 2020 VHA Urology E&M Note	00667_Mousser_VHA_00757	
487.	October 8, 2020 VHA Urology Note	00667_Mousser_VHA_00758-00761	
488.	October 8, 2020 VHA Consent Form	00667_Mousser_VHA_00762-00764	
489.	October 8, 2020 VHA Urology E&M Note	00667_Mousser_VHA_00765	
490.	October 7, 2020 VHA Primary Care Telephone Encounter Note	00667_Mousser_VHA_00766	
491.	October 6, 2020 VHA Urology E&M Note	00667_Mousser_VHA_00767	
492.	September 29, 2020 VHA Urology E&M Note	00667_Mousser_VHA_00768-00769	
493.	September 23, 2020 VHA Nursing Note	00667_Mousser_VHA_00770	
494.	September 16, 2020 VHA Urology Note	00667_Mousser_VHA_00771-00773	
495.	September 12, 2020 VHA Letters	00667_Mousser_VHA_00774	
496.	September 12, 2020 VHA Non VA Note	00667_Mousser_VHA_00775-00777	
497.	September 7, 2020 VHA Emergency Dept Discharge Note	00667_Mousser_VHA_00778-00780	
498.	September 7, 2020 VHA Physician Emergency Dept Note	00667_Mousser_VHA_00781-00782	
499.	September 7, 2020 VHA Emergency Dept E&M Note	00667_Mousser_VHA_00783-00792	
500.	September 5, 2020 VHA Telephone Encounter Note	00667_Mousser_VHA_00793-00795	
501.	September 4, 2020 VHA Telephone Encounter Note	00667_Mousser_VHA_00796	
502.	September 3, 2020 VHA Procedure Note	00667_Mousser_VHA_00797-00801	
503.	September 3, 2020 VHA Anesthesiology Operative Note	00667_Mousser_VHA_00802-00803	
504.	September 3, 2020 VHA Post Operative E&M Note	00667_Mousser_VHA_00804	
505.	September 3, 2020 VHA Post Operative E&M Note	00667_Mousser_VHA_00805-00807	
506.	September 3, 2020 VHA Anesthesiology Operative Note	00667_Mousser_VHA_00808-00809	
507.	September 3, 2020 VHA Nursing Operative Note	00667_Mousser_VHA_00810-00816	

508.	September 3, 2020 VHA Anesthesiology Attending Pre Operative E&M Note	00667_Mousser_VHA_00817-00818	
509.	September 3, 2020 VHA Fall Risk Assessment Note	00667_Mousser_VHA_00819-00820	
510.	September 3, 2020 VHA Nursing Note	00667_Mousser_VHA_00821-00823	
511.	September 3, 2020 VHA Physician Admission Evaluation Note	00667_Mousser_VHA_00824-00825	
512.	September 3, 2020 VHA Nursing Procedure Note	00667_Mousser_VHA_00826-00829	
513.	September 2, 2020 VHA Telephone Encounter Note	00667_Mousser_VHA_00831-00832	
514.	September 1, 2020 VHA Nephrology Telephone Encounter Note	00667_Mousser_VHA_00833-00834	
515.	September 1, 2020 VHA Anesthesiology Consult	00667_Mousser_VHA_00835-00838	
516.	August 31, 2020 VHA Nursing Admission Evaluation Note	00667_Mousser_VHA_00839-00845	
517.	August 31, 2020 VHA Consent Form	00667_Mousser_VHA_00846-00848	
518.	August 31, 2020 VHA Nursing Procedure Note	00667_Mousser_VHA_00849-00851	
519.	August 31, 2020 VHA Urology Note	00667_Mousser_VHA_00852-00855	
520.	August 30, 2020 VHA Urology E&M Note	00667_Mousser_VHA_00856-00857	
521.	August 26, 2020 VHA Urology Consult	00667_Mousser_VHA_00858-00859	
522.	August 26, 2020 VHA Nursing Note	00667_Mousser_VHA_00860-00861	
523.	August 25, 2020 VHA Radiology Note	00667_Mousser_VHA_00863	
524.	August 20, 2020 VHA Nephrology Telephone Encounter Note	00667_Mousser_VHA_00864	
525.	August 19, 2020 VHA Administrative Note	00667_Mousser_VHA_00865	
526.	August 18, 2020 VHA Urology Nursing Note	00667_Mousser_VHA_00866	
527.	August 13, 2020 VHA Primary Care Note	00667_Mousser_VHA_00868-00871	
528.	August 13, 2020 VHA Telephone Encounter Note	00667_Mousser_VHA_00872	
529.	August 6, 2020 VHA Nephrology Consult	00667_Mousser_VHA_00873-00875	
530.	August 3, 2020 VHA Kidney	00667_Mousser_VHA_00877-	

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531.	July 30, 2020 VHA Primary Care Telephone Encounter Note	00667_Mousser_VHA_00891- 00895	
532.	July 6, 2020 VHA Primary Care Note	00667_Mousser_VHA_00898- 00901	
533.	July 6, 2020 VHA Physician Note	00667_Mousser_VHA_00902- 00903	
534.	July 6, 2020 VHA Primary Care Nursing Note	00667_Mousser_VHA_00904- 00907	
535.	July 2, 2020 VHA Primary Care Telephone Encounter Note	00667_Mousser_VHA_00908- 00909	
536.	June 4, 2020 VHA Primary Care Nursing Note	00667_Mousser_VHA_00910- 00914	
537.	VHA Consult Requests From June 3, 2020 through March 20, 2024	00667_Mousser_VHA_00916- 001075	
538.	VHA Radiology Reports From August 25, 2020 Through July 27, 2023	00667_Mousser_VHA_001076- 001087	
539.	VHA Surgical Information From September 3, 2020 Through October 21, 2020	00667_Mousser_VHA_001088- 001102	
540.	VHA Vitals From July 6, 2020 Through February 8, 2024	00667_Mousser_VHA_001186- 001215	
541.	March 28, 2024 VHA Hospital Imaging Form	00667_Mousser_VHA_001225	
542.	September 27, 2022 VHA Request to Scan Non-VA Documents	00667_Mousser_VHA_001264	
543.	September 10, 2022 San Antonio Sleep Centers Report for Frank Mousser	00667_Mousser_VHA_001276- 001277	
544.	July 1, 2021 VHA Fax Transmittal	00667_Mousser_VHA_001302- 001306	
545.	October 20, 2020 VHA Post- Op Record	00667_Mousser_VHA_001336- 001337	
546.	October 20, 2020 VHA Post- Op Report	00667_Mousser_VHA_001338	
547.	October 20, 2020 VHA Post- Op Summary	00667_Mousser_VHA_001339- 001341	
548.	October 20, 2020 VHA Post- Op Record	00667_Mousser_VHA_001342- 001343	
549.	October 20, 2020 VHA Post- Op Staff Report	00667_Mousser_VHA_001344	
550.	October 21, 2020 VHA Anesthesia Record	00667_Mousser_VHA_001348- 001363	

551.	October 20, 2020 VHA Universal Protocol: Procedure Verification Checklist	00667_Mousser_VHA_001364	
552.	September 3, 2020 VHA Post-Op Record	00667_Mousser_VHA_001370	
553.	September 3, 2020 VHA Post-Op Staff Report	00667_Mousser_VHA_001371	
554.	September 3, 2020 VHA Post-Op Summary	00667_Mousser_VHA_001372-001373	
555.	September 3, 2020 VHA Anesthesia Record	00667_Mousser_VHA_001374-001375	
556.	September 3, 2020 VHA Intra-Op Staff Report	00667_Mousser_VHA_001376	
557.	September 3, 2020 VHA Intra-Op Summary	00667_Mousser_VHA_001377-001378	
558.	September 3, 2020 VHA Universal Protocol: Procedure Verification Checklist	00667_Mousser_VHA_001379	
559.	July 28, 2021 Peterson Health Imaging Department MRI Results	00667_Mousser_VHA_001414-001415	
560.	April 16, 2020 MRI Now MRI Results	00667_Mousser_VHA_001416-001417	
561.	June 24, 2024 VHA Request for Services Form	00667_Mousser_VHA_001421-001423	
562.	May 21, 2024 VHA Request for Services Form	00667_Mousser_VHA_001424-001426	
563.	July 8, 2024 VHA Letters	00667_Mousser_VHA_001451-001452	
564.	June 26, 2024 VHA No Show Note	00667_Mousser_VHA_001455	
565.	June 7, 2024 VHA Nephrology Note	00667_Mousser_VHA_001457-001461	
566.	June 7, 2024 VHA Nephrology Note	00667_Mousser_VHA_001462-001468	
567.	June 7, 2024 VHA Nursing Note	00667_Mousser_VHA_001469-001470	
568.	June 6, 2024 VHA Pharmacy Note	00667_Mousser_VHA_001472	
569.	June 5, 2024 VHA Letters	00667_Mousser_VHA_001473-001474	
570.	May 30, 2024 VHA Letters	00667_Mousser_VHA_001475-001476	
571.	May 22, 2024 VHA Letters	00667_Mousser_VHA_001477-001478	
572.	May 15, 2024 VHA Primary Care Note	00667_Mousser_VHA_001480-001483	
573.	May 15, 2024 VHA Physician Note	00667_Mousser_VHA_001484-001488	
574.	May 15, 2024 VHA Primary	00667_Mousser_VHA_001489-	

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575.	May 6, 2024 VHA Mental Health Diagnostic Study Note	00667_Mousser_VHA_001494-001495	
576.	May 6, 2024 VHA Primary Care Note	00667_Mousser_VHA_001496-001498	
577.	May 6, 2021 VHA Telehealth Note	00667_Mousser_VHA_001499-01504	
578.	May 3, 2024 VHA No Show Note	00667_Mousser_VHA_001505	
579.	April 26, 2024 VHA NonVA Note	00667_Mousser_VHA_001507-001508	
580.	May 21, 2024 VHA Consult Request	00667_Mousser_VHA_001509-001519	
581.	June 16, 2024 VHA Vitals	00667_Mousser_VHA_001545-001546	
582.	Jan 13, 2025 VHA Vitals	00667_Mousser_VHA_001560-001561	
583.	VHA Mousser Lab Results as of January 13, 2025	00667_Mousser_VHA_001563-001577	
584.	VHA Consult Requests From January 2, 2025 Through January 6, 2025	00667_Mousser_VHA_001578-001594	
585.	January 6, 2025 VHA Consent Form	00667_Mousser_VHA_001595-001597	
586.	January 6, 2025 VHA Nursing Admission Evaluation Note	00667_Mousser_VHA_001598-001605	
587.	January 6, 2025 VHA Urology Note	00667_Mousser_VHA_001605-001610	
588.	January 6, 2025 VHA Anesthesiology Consult	00667_Mousser_VHA_001610-001615	
589.	January 3, 2025 VHA NonVA Note	00667_Mousser_VHA_001615-001616	
590.	January 3, 2025 VHA Letters	00667_Mousser_VHA_001616-001617	
591.	January 3, 2025 VHA Letters	00667_Mousser_VHA_001617-001618	
592.	January 2, 2025 VHA Urology Nursing Note	00667_Mousser_VHA_001618-001619	
593.	December 28, 2024 VHA NonVA Note	00667_Mousser_VHA_001619-1620	
594.	November 12, 2024 VHA Letters	00667_Mousser_VHA_001624-001626	
595.	November 8, 2024 VHA Nephrology Note	00667_Mousser_VHA_001626-001630	
596.	November 8, 2024 VHA Nursing Note	00667_Mousser_VHA_001630-001631	
597.	November 8, 2024 VHA Nephrology Note	00667_Mousser_VHA_001631-001638	
598.	November 7, 2024 VHA Urology E&M Note	00667_Mousser_VHA_001638-001639	

599.	October 28, 2024 VHA Nursing Note	00667_Mousser_VHA_001639-001640	
600.	October 28 2024 VHA Consent Form	00667_Mousser_VHA_001641-001642	
601.	October 28, 2024 VHA Urology Procedure Note	00667_Mousser_VHA_001642-001646	
602.	October 17, 2024 VHA Optometry Note	00667_Mousser_VHA_001646-001647	
603.	October 17, 2024 VHA Eye Note	00667_Mousser_VHA_001647-001660	
604.	October 17, 2024 VHA Eye Note	00667_Mousser_VHA_001660-001668	
605.	September 30, 2024 VHA Urology Secure Messaging	00667_Mousser_VHA_001669	
606.	January 6, 2025 VHA ECG Results	00667_Mousser_VHA_001675	
607.	January 6, 2025 VHA Consent for Clinical Treatment/Procedure	00667_Mousser_VHA_001676-001679	
608.	December 11, 20224 VHA Request for Services Form	00667_Mousser_VHA_001680-001682	
609.	April 24, 2024 VHA Request for Services Form	00667_Mousser_VHA_001696-001698	
610.	January 31, 2025 VHA PACU Record	00667_Mousser_VHA_001700	
611.	January 31, 2025 VHA PACU Staff Report	00667_Mousser_VHA_001701	
612.	January 31, 2025 VHA PACU Summary	00667_Mousser_VHA_001702	
613.	January 31, 2025 VHA Anesthesia Record	00667_Mousser_VHA_001703-001704	
614.	January 31, 2025 VHA Anesthesia Staff Report	00667_Mousser_VHA_001705	
615.	January 31, 2025 VHA Anesthesia Summary	00667_Mousser_VHA_001706-001707	
616.	January 31, 2025 VHA Universal Protocol: Procedure Verification Checklist	00667_Mousser_VHA_001708	
617.	February 11, 2025 VHA Telephone Encounter Note	00667_Mousser_VHA_001724	
618.	February 11, 2025 VHA Accounting of Disclosures Note	00667_Mousser_VHA_001725	
619.	February 11, 2025 VHA Medication Mgt Note	00667_Mousser_VHA_001726-001727	
620.	February 11, 2025 VHA Physician Note	00667_Mousser_VHA_001729-001730	
621.	February 11, 2025 VHA Primary Care Nursing Note	00667_Mousser_VHA_001731-001735	
622.	February 10, 2025 VHA	00667_Mousser_VHA_001737	

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623.	February 6, 2025 VHA Letters	00667_Mousser_VHA_001738-001739	
624.	January 31, 2025 VHA Post Operative E&M Note	00667_Mousser_VHA_001741	
625.	January 31, 2025 VHA Procedure Note	00667_Mousser_VHA_001742-001744	
626.	January 31, 2025 VHA Anesthesiology Operative Note	00667_Mousser_VHA_001745-001746	
627.	January 31, 2025 VHA Anesthesiology Operative Note	00667_Mousser_VHA_001747-001748	
628.	January 31, 2025 VHA Anesthesiology Attending Pre Operative E&M Note	00667_Mousser_VHA_001749-001750	
629.	January 31, 2025 VHA Nursing Operative Note	00667_Mousser_VHA_001751-001757	
630.	January 31, 2025 VHA Post Operative E&M Note	00667_Mousser_VHA_001758-001759	
631.	January 31, 2025 VHA Physician Admission Evaluation Note	00667_Mousser_VHA_001760-001761	
632.	January 31, 2025 VHA Nursing Note	00667_Mousser_VHA_001762-001764	
633.	January 31, 2025 VHA Nursing Procedure Note	00667_Mousser_VHA_001765-001770	
634.	January 30, 2025 VHA Telephone Encounter Note	00667_Mousser_VHA_001773-001774	
635.	January 30, 2025 VHA Urology Secure Messaging	00667_Mousser_VHA_001775-001776	
636.	January 23, 2025 VHA Urology Secure Messaging	00667_Mousser_VHA_001797	
637.	January 22, 2025 VHA Urology Secure Messaging	00667_Mousser_VHA_001798-001799	
638.	January 21, 2025 VHA Urology Secure Messaging	00667_Mousser_VHA_001800-001803	
639.	January 16, 2025 VHA Telephone Encounter Note	00667_Mousser_VHA_001804	
640.	VHA Lab Results as of March 5, 2025	00667_Mousser_VHA_001809-001813	
641.	January 31, 2025 VHA Operative Report	00667_Mousser_VHA_001814-001815	
642.	January 31, 2025 VHA Anesthesiology Report	00667_Mousser_VHA_001815-001816	
643.	January 31, 2025 VHA Nursing Operative Note	00667_Mousser_VHA_001816-001819	
644.	March 5, 2025 VHA Vitals	00667_Mousser_VHA_001852-001855	

645.	January 22, 2026 Freedom Spine & Pain Center Record	00667_Mousser_VHA_001858-001861	
646.	December 19, 2025 Freedom Spine & Pain Center Record	00667_Mousser_VHA_001862-001865	
647.	November 20, 2025 Freedom Spine & Pain Center Record	00667_Mousser_VHA_001866-001869	
648.	October 23, 2025 Freedom Spine & Pain Center Record	00667_Mousser_VHA_001870-001873	
649.	September 18, 2025 Freedom Spine & Pain Center Record	00667_Mousser_VHA_001874-001877	
650.	August 21, 2025 Freedom Spine & Pain Center Record	00667_Mousser_VHA_001878-001881	
651.	June 26, 2025 Freedom Spine & Pain Center Record	00667_Mousser_VHA_001882-001885	
652.	July 9, 2025 VHA Request for Services Form	00667_Mousser_VHA_001886-001888	
653.	March 27, 2026 VHA Problem Lists	00667_Mousser_VHA_001894-001912	
654.	February 18, 2026 VHA MHV Dialog Note	00667_Mousser_VHA_001915	
655.	February 13, 2026 VHA Primary Care Note	00667_Mousser_VHA_001918-001921	
656.	February 13, 2026 VHA Medication Mgt Note	00667_Mousser_VHA_001922-0019223	
657.	February 13, 2026 VHA Accounting of Disclosures Note	00667_Mousser_VHA_001924	
658.	February 13, 2026 VHA Physician Note	00667_Mousser_VHA_001925-001928	
659.	February 13, 2026 VHA Primary care Nursing Note	00667_Mousser_VHA_001929-001934	
660.	February 9, 2026 VHA Nephrology Note	00667_Mousser_VHA_001935-001941	
661.	February 5, 2026 VHA Nursing Note	00667_Mousser_VHA_001942-001943	
662.	February 4, 2026 VHA Letters	00667_Mousser_VHA_001944	
663.	February 4, 2026 VHA Letters	00667_Mousser_VHA_001945-001946	
664.	October 31, 2025 VHA MHV Dialog Note	00667_Mousser_VHA_001949	
665.	October 27, 2025 VHA MHV Dialog Note	00667_Mousser_VHA_001950	
666.	September 26, 2025 VHA Urology Secure Messaging	00667_Mousser_VHA_001951-001952	
667.	August 6, 2025 VHA NonVA Note	00667_Mousser_VHA_001967-001968	
668.	August 6, 2025 VHA Letters	00667_Mousser_VHA_001969-001970	
669.	August 6, 2025 VHA Letters	00667_Mousser_VHA_001971-001972	

670.	August 4, 2025 VHA Nephrology Note	00667_Mousser_VHA_001973-001977	
671.	August 4, 2025 VHA Nephrology Note	00667_Mousser_VHA_001978-001984	
672.	July 20, 2025 VHA Letters	00667_Mousser_VHA_001986-001987	
673.	July 20, 2025 VHA Letters	00667_Mousser_VHA_001988-01989	
674.	July 20, 2025 VHA NonVA Note	00667_Mousser_VHA_001990	
675.	July 19, 2025 VHA NonVA Note	00667_Mousser_VHA_001991-001992	
676.	June 11, 2025 VHA Consent Form	00667_Mousser_VHA_001997-001998	
677.	June 11, 2025 VHA Urology Procedure Note	00667_Mousser_VHA_001999-002001	
678.	June 11, 2025 VHA Nursing Note	00667_Mousser_VHA_002002-002003	
679.	May 27, 2025 VHA NonVA Note	00667_Mousser_VHA_002005-002006	
680.	May 19, 2025 VHA Urology Secure Messaging	00667_Mousser_VHA_002008	
681.	May 19, 2025 VHA MHV Dialog Note	00667_Mousser_VHA_002009	
682.	May 19, 2025 VHA MHV Dialog Note	00667_Mousser_VHA_002010-002011	
683.	April 21, 2025 VHA Mental Health Secure Messaging	00667_Mousser_VHA_002016	
684.	April 8, 2025 VHA Urology Secure Messaging	00667_Mousser_VHA_002018	
685.	March 19, 2025 VHA Mental health Outpatient Note	00667_Mousser_VHA_002023-002029	
686.	VHA Consult Requests From August 6, 2025 Through February 13, 2026	00667_Mousser_VHA_002030-002046	
687.	VHA Lab Results as of March 27, 2026	00667_Mousser_VHA_002051-002073	
688.	VHA Medications	00667_Mousser_VHA_002076-002112	
689.	VHA Mousser Vitals	00667_Mousser_VHA_002113-002118	
690.	February 13, 2026 VHA ECG Results	00667_Mousser_VHA_002120	
691.	March 10, 2025 Subpoena	00667_Mousser_FSPC_001-0038	
692.	February 20, 2025 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0040-0043	
693.	January 30, 2025 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0044-0047	

694.	December 19, 2024 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0048-0050	
695.	October 24, 2024 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0051-0053	
696.	September 25, 2024 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0054-0056	
697.	August 22, 2024 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0057-0060	
698.	July 11, 2024 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0061-0064	
699.	May 30, 2024 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0065-0067	
700.	April 25, 2024 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0068-0070	
701.	March 28, 2024 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0071-0073	
702.	March 1, 2024 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0074-0076	
703.	January 24, 2024 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0077-0079	
704.	November 28, 2023 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0080-0082	
705.	November 28, 2023 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0083-0086	
706.	October 25, 2023 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0087-0089	
707.	September 6, 2023 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0090-0092	
708.	July 31, 2023 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0093-0095	
709.	June 21, 2023 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0096-0098	
710.	May 24, 2023 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_0099-00101	

	Note		
711.	April 13, 2023 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00102-00104	
712.	March 16, 2023 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00105-00107	
713.	January 25, 2023 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00108-00110	
714.	November 16, 2022 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00111-00113	
715.	October 20, 2022 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00114-00116	
716.	September 21, 2022 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00117-00119	
717.	August 24, 2022 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00120-00122	
718.	June 30, 2022 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00123-00125	
719.	May 19, 2022 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00126-00128	
720.	April 25, 2022 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00129-00131	
721.	March 24, 2022 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00132-00135	
722.	February 10, 2022 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00136-00138	
723.	December 14, 2021 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00139-00141	
724.	November 2, 2021 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00142-00144	
725.	October 7, 2021 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00145-00148	
726.	September 8, 2021 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00149-00152	
727.	July 8, 2021 Freedom Spine	00667_Mousser_FSPC_00153-	

	and Pain Center Treatment Note	00156	
728.	September 23, 2020 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00157-00160	
729.	September 2, 2020 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00161-00163	
730.	August 10, 2020 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00164-00167	
731.	August 3, 2020 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00168-00170	
732.	July 20, 2020 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00171-00173	
733.	June 11, 2020 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00174-00177	
734.	April 23, 2020 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00178-00180	
735.	March 26, 2020 Freedom Spine and Pain Center Treatment Note	00667_Mousser_FSPC_00181-00184	
736.	Mousser Urine Drug Screen Results From July 8, 2021 Through March 11, 2025	00667_Mousser_FSPC_00185-00328	
737.	August 3, 2022 Peterson Health Imaging Department Results	00667_Mousser_FSPC_00329-00332	
738.	July 28, 2021 Peterson Health Imaging Department Results	00667_Mousser_FSPC_00334-00335	
739.	June 15, 2020 Drug Monitoring Report	00667_Mousser_FSPC_00336-00339	
740.	April 7, 2020 Laboratory Results	00667_Mousser_FSPC_00343-00345	
741.	June 4, 2025 Subpoena	00667_Mousser_STCC_001-0042	
742.	October 24, 2024 South Texas Cardiovascular Consultants Treatment Note	00667_Mousser_STCC_0044-0047	
743.	July 27, 2023 South Texas Cardiovascular Consultants Treatment Note	00667_Mousser_STCC_0048-0050	
744.	May 5, 2022 South Texas Cardiovascular Consultants Treatment Note	00667_Mousser_STCC_0051-0053	
745.	March 16, 2021 South Texas Cardiovascular Consultants	00667_Mousser_STCC_0054-0057	

	Treatment Note		
746.	March 17, 2020 South Texas Cardiovascular Consultants Treatment Note	00667_Mousser_STCC_0058-0060	
747.	February 12, 2019 South Texas Cardiovascular Consultants Treatment Note	00667_Mousser_STCC_0061-0063	
748.	June 20, 2018 South Texas Cardiovascular Consultants Treatment Note	00667_Mousser_STCC_0064-0066	
749.	December 20, 2017 South Texas Cardiovascular Consultants Treatment Note	00667_Mousser_STCC_0067-0069	
750.	June 1, 2017 South Texas Cardiovascular Consultants Treatment Note	00667_Mousser_STCC_0070-0071	
751.	November 10, 2016 South Texas Cardiovascular Consultants Treatment Note	00667_Mousser_STCC_0072-0074	
752.	October 11, 2016 South Texas Cardiovascular Consultants Treatment Note	00667_Mousser_STCC_0075-0077	
753.	April 6, 2016 South Texas Cardiovascular Consultants Treatment Note	00667_Mousser_STCC_0078-0080	
754.	South Texas Cardiovascular Consultants Laboratory Results From June 2, 2017 Through November 29, 2016	00667_Mousser_STCC_0081-0083	
755.	October 11, 2016 Peterson Regional Medical Center Laboratory Results	00667_Mousser_STCC_0084-0085	
756.	South Texas Cardiovascular Consultants ECG Results From June 1, 2017 Through October 24, 2024	00667_Mousser_STCC_0086-0093	
757.	October 2016 South Texas Cardiovascular Consultants Surgery Surgical Operation Notes	00667_Mousser_STCC_0094-00101	
758.	April 6, 2016 South Texas Cardiovascular Consultants ECG Result	00667_Mousser_STCC_00102	
759.	October 12, 2016 South Texas Cardiovascular Consultants Nuclear Cardiology Report	00667_Mousser_STCC_00103-00107	
760.	October 11, 2016 South Texas Cardiovascular Consultants Treatment Note	00667_Mousser_STCC_00108	
761.	October 11, 2016 South Texas	00667_Mousser_STCC_00109	

	Cardiovascular Consultants ECG Result		
762.	October 11, 2016 Peterson Regional Medical Center Procedure Note	00667_Mousser_STCC_00110- 00112	
763.	Mousser Social Security Administration Records	00667_Mousser_SSA_001-00453	
764.	July 29, 2024 Declaration of Records	00667_Mousser_CAM_002	
765.	December 21, 2022 Payroll/Status Change	00667_Mousser_CAM_004	
766.	November 4, 2020 Return to Work Form	00667_Mousser_CAM_0010	
767.	April 9, 2014 Drug Screen Results	00667_Mousser_CAM_0015- 0016	
768.	December 5, 2016 Letter	00667_Mousser_CAM_0037	
769.	April 13, 2011 Peterson Regional Medical Center Outreach Laboratory Results	00667_Mousser_CAM_00105- 00107	
770.	Marriage License	00667_Mousser_0023-0024	
771.	September 19, 2022 VHA Urology Procedure Note	00667_Mousser_00171-00174	
772.	October 8, 2020 VHA Urology Note	00667_Mousser_00640-00643	
773.	October 8, 2020 VHA Consent Form	00667_Mousser_00643-00645	
774.	March 20, 2023 Labcorp Report	00667_Mousser_00830-00831	
775.	March 21, 2022 VHA Urology Procedure Note	00667_Mousser_001017-001020	
776.	September 1, 2020 Nephrology Telephone Encounter Note	00667_Mousser_001469-001470	
777.	September 1, 2020 Anesthesiology Consult	00667_Mousser_001470-001474	
778.	August 26, 2020 VHA Urology Consult	00667_Mousser_002226-002228	
779.	August 6, 2020 VHA Administrative Note	00667_Mousser_002229	
780.	February 10, 1984 Clinical Record	00667_Mousser_002306	
781.	Medical Record Consultation Sheet	00667_Mousser_002307	
782.	October 27, 2020 VHA Primary Care Telephone Encounter Note	00667_Mousser_002540-002543	
783.	October 27, 2020 VHA Urology Note	00667_Mousser_002543	
784.	February 3, 2021 VHA Urology Procedure Note	00667_Mousser_003004-003009	

785.	May 4, 2021 VHA Administrative Note	00667_Mousser_003161-003166	
786.	May 5, 2021 VHA Urology Procedure Note	00667_Mousser_003162-003163	
787.	September 29, 2020 VHA Addendum	00667_Mousser_003350-003352	
788.	September 7, 2020 Emergency Department Treatment Note	00667_Mousser_003362-003371	
789.	May 5, 2021 VHA Urology Procedure Note	00667_Mousser_003812-003816	
790.	September 7, 2020 VHA Treatment Note	00667_Mousser_003988-003989	
791.	April 25, 2018 HCM Medical Group Treatment Note	00667_Mousser_004626	
792.	September 29, 2017 Pathology Report	00667_Mousser_004628-004629	
793.	November 7, 2013 Peterson Regional Medical Center Records	00667_Mousser_004836-004838	
794.	October 20, 2020 Immediate Postoperative Note	00667_Mousser_005418-005421	
795.	September 3, 2020 VHA PACU Record	00667_Mousser_005495-005497	
796.	September 1, 2020 Pre-Anesthesia Unit Consult Note	00667_Mousser_005521-005525	
797.	VA Laboratory Results From June 20, 2020 Through December 22, 2023	00667_Mousser_005598-005812	
798.	October 29, 2020 Pathology Report	00667_Mousser_005813-005815	
799.	September 14, 2020 Cytopathology Report	00667_Mousser_005816-005817	
800.	Mousser Field Records Data	00667_Mousser_006010	
801.	Mousser Career Sea Service Eligibility Affidavit	00667_Mousser_006040	
802.	Mousser Individual Deployment Record	00667_Mousser_006042	
803.	Mousser Chronological Record	00667_Mousser_006110	
804.	September 28, 2023 Toxic Exposure Risk Activity Memorandum	00667_Mousser_006141-006142	
805.	January 16, 2020 Franklin Clinic Treatment Note	00667_Mousser_007283-007284	
806.	December 10, 2019 Franklin Clinic Treatment Note	00667_Mousser_007286-007289	
807.	December 2, 2019 Franklin Clinic Treatment Note	00667_Mousser_007290-007293	
808.	September 12, 2019 Franklin Clinic Treatment Note	00667_Mousser_007297	

809.	June 27, 2019 Franklin Clinic Treatment Note	00667_Mousser_007298	
810.	April 4, 2019 Franklin Clinic Treatment Note	00667_Mousser_007299	
811.	January 23, 2019 Franklin Clinic Treatment Note	00667_Mousser_007301-007303	
812.	December 27, 2018 Franklin Clinic Treatment Note	00667_Mousser_007305-007307	
813.	December 6, 2017 Franklin Clinic Treatment Note	00667_Mousser_007312-007314	
814.	July 31, 2017 Kerrville Imaging Report	00667_Mousser_007323-007324	
815.	January 16, 2020 Treatment Note	00667_Mousser_007325	
816.	April 4, 2019 Treatment Note	00667_Mousser_007326	
817.	February 6, 2017 Franklin Clinic Treatment Note	00667_Mousser_007330-007332	
818.	August 10, 2016 Franklin Clinic Treatment Note	00667_Mousser_007333-007334	
819.	May 18, 2016 Franklin Clinic Treatment Note	00667_Mousser_007335-007336	
820.	June 15, 2015 Franklin Clinic Treatment Note	00667_Mousser_007337-007338	
821.	May 15, 2015 Franklin Clinic Treatment Note	00667_Mousser_7339-007340	
822.	September 24, 2014 Franklin Clinic Treatment Note	00667_Mousser_007341-007342	
823.	July 1, 2014 Franklin Clinic Treatment Note	00667_Mousser_7343-007344	
824.	April 3, 2014 Franklin Clinic Treatment Note	00667_Mousser_007345-007346	
825.	January 3, 2014 Franklin Clinic Treatment Note	00667_Mousser_007347-007348	
826.	October 9, 2013 Franklin Clinic Treatment Note	00667_Mousser_007349-007350	
827.	July 16, 2013 Franklin Clinic Treatment Note	00667_Mousser_007351-007352	
828.	March 22, 2013 Franklin Clinic Treatment Note	00667_Mousser_007353-007354	
829.	December 19, 2012 Franklin Clinic Treatment Note	00667_Mousser_007355-007356	
830.	July 15, 2022 VHA Nursing Note	00667_Mousser_008092	
831.	March 6, 2018 South Texas Cardiovascular Consultants Treatment Note	00667_Mousser_008628-008630	
832.	October 18, 2017 HCM Medical Group Treatment Note	00667_Mousser_008666-008668	
833.	October 6, 2017 Peterson	00667_Mousser_008675-008676	

	Regional Medical Center Procedure Report		
834.	October 16, 2018 Treatment Note	00667_Mousser_009257-009259	
835.	April 25, 2018 HCM Medical Group Treatment Note	00667_Mousser_009264-009266	
836.	April 18, 2018 HCM Medical Group Treatment Note	00667_Mousser_009267-009268	
837.	September 28, 2017 Treatment Note	00667_Mousser_009272-009274	
838.	June 23, 2017 Treatment Note	00667_Mousser_009275	
839.	April 25, 2018 HCM Hospital Laboratory Results	00667_Mousser_009276	
840.	September 28, 2017 Lab Results	00667_Mousser_009280	
841.	October 8, 2018 HCM Patient Paperwork	00667_Mousser_009292-009299	
842.	April 26, 2018 HCM Department of Surgery Schedule/Order Form	00667_Mousser_009307	
843.	September 26, 2017 New Patient Paperwork	00667_Mousser_009323-009330	
844.	June 26, 2025 Freedom Spine and Pain Center Treatment Note	00667_Mousser_009349-009352	
845.	May 21, 2025 Freedom Spine and Pain Center Treatment Note	00667_Mousser_009353-009356	
846.	April 17, 2025 Freedom Spine and Pain Center Treatment Note	00667_Mousser_009357-009360	
847.	Marh 20, 2025 Freedom Spine and Pain Center Treatment Note	00667_Mousser_009361-009363	
848.	August 3, 2022 Peterson Health Imaging Department Results	00667_Mousser_009509-009512	
849.	November 1, 2024 VHA Urology Telephone Encounter Note	00667_Mousser_009595-009598	
850.	October 23, 2020 Surgery Discharge Note	00667_Mousser_009699-009706	
851.	October 8, 2020 Urology E&M Note	00667_Mousser_009719	
852.	October 8, 2020 Urology E&M Note	00667_Mousser_009719-009721	
853.	September 3, 2020 Physician Admission Evaluation Note	00667_Mousser_009735-009736	
854.	September 3, 2020 Post Operative E&M Note	00667_Mousser_009736-009738	

855.	Mousser Field Records Data	00667_Mousser_VBA_0090	
856.	Mousser Chronological Record	00667_Mousser_VBA_00111	
857.	Mousser Career Service Eligibility Affidavit	00667_Mousser_VBA_00120	
858.	Mousser Individual Deployment Record	00667_Mousser_VBA_00122	
859.	National Archives and Records Administration NPRC MPR Search Request	00667_Mousser_NARA_0034	
860.	Intentionally Blank		
861.	Intentionally Blank		
862.	Intentionally Blank		
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864.	Intentionally Blank		
865.	VHA Offsets Data Narrative Summary	CLJA_VHA_0000000002- CLJA_VHA_0000000005	Objection — Fed. R. Evid. 702, 703, 402, 403; CLJA § 804(e)(2)(B); reliability; completeness; waste of time, etc.; D.E. 885. Fed. R. Evid. 802, 803(6), foundation.
866.	VHA Offsets Data	CLJA_VHA_0000000006	Objection — Fed. R. Evid. 702, 703, 402, 403; CLJA § 804(e)(2)(B); reliability; completeness; waste of time, etc.; D.E. 885. Foundation, Fed. R. Evid. 803(6)(E), 1006, 402; Fed. R. Civ. P. 5.2.
867.	Intentionally Blank		
868.	VHA Offsets Data Dictionary	CLJA_VHA_0000000008	
869.	Intentionally Blank		
870.	Intentionally Blank		
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873.	Intentionally Blank		
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875.	VBA Offsets Data	CLJA_VBA_0000000001- CLJA_VBA_0000000018	Objection — Fed. R. Evid. 702, 703, 401, 402, 403; CLJA § 804(e)(2)(B); reliability;

			<p>completeness; waste of time, etc.; D.E. 860; D.E. 885.</p> <p>Foundation, Fed. R. Evid. 803(6)(E), 1006, 402; Fed. R. Civ. P. 5.2.</p>
876.	VBA Offsets Data	CLJA_VBA_0000000019	<p>Objection — Fed. R. Evid. 702, 703, 402, 403; CLJA § 804(e)(2)(B); reliability; completeness; waste of time, etc.; D.E. 860; D.E. 885.</p> <p>Fed. R. Civ. P. 5.2.</p>
877.	VBA Offsets Data Statement	CLJA_VBA_0000000020- CLJA_VBA_0000000022	<p>Objection — Fed. R. Evid. 702, 703, 402, 403; CLJA § 804(e)(2)(B); reliability; completeness; waste of time, etc.; D.E. 860; D.E. 885.</p>
878.	Expert Rep. – Wang Ji, M.D. (Dec. 15, 2025)		<p>Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)</p>
879.	1 st Supp. Expert Rep. – Wang Ji, M.D. (Aug. 9, 2026)		<p>Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)</p>
880.	Materials Considered List of Wang Ji, M.D. (Dec. 22, 2025)		<p>Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)</p>
881.	1 st Supp. Materials Considered List of Wang Ji, M.D. (Jan. 26, 2026)		<p>Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)</p>

882.	2 nd Supp. Materials Considered List of Wang Ji, M.D. (May 13, 2026)		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
883.	3 rd Supp. Materials Considered List of Wang Ji, M.D. (Aug. 10, 2026)		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
884.	Track 1 Trial Plaintiff Damages Assessment – Mousser – 8/6/24	00667_Mousser_008697-008701	
885.	1st Am. Damages Assessment Form – Mousser – 9/6/24		
886.	2nd Am. Damages Assessment Form – Mousser – 10/29/25		
887.	3rd Am. Damages Assessment – Mousser		
888.	FRE 1006(a) Summary Chart – Offsets – Wang Ji, M.D.	To be provided	Plaintiff reserves all objections, including Fed R. Evid. 1006, 702, and foundation until chart is provided.
889.	Appendix – Offsets Government Payments (<i>Mousser</i>) – Wang Ji, M.D.	Ji_USA_0000000006	Fed. R. Evid 702, 702, 1006, and foundation
890.	Expert Rep. – Tricia Yount (<i>Mousser</i>) (Dec. 15, 2025)		Objection — Fed. R. Evid. 702, 703, 402, 403, 1006; D.E. 864; D.E. 860; D.E. 885. Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
891.	Materials Considered List – Tricia Yount (<i>Mousser</i>) (Dec. 22, 2025)		Objection — Fed. R. Evid. 702, 703, 402, 403; D.E. 864; D.E. 860; D.E. 885. Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is

			subject to cross-examination at trial)
892.	<i>Curriculum vitae</i> of Tricia M. Yount, CPA, MAFF	(Yount Dep. Ex. 2)	Objection — Fed. R. Evid. 702, 703, 402, 403; 802; D.E. 864; D.E. 860; D.E. 885. (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
893.	Supp. Materials Considered List – Tricia Yount (Feb. 5, 2026)		Objection — Fed. R. Evid. 702, 703, 402, 403; D.E. 864; D.E. 860; D.E. 885. Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
894.	Bureau of Labor Statistics; Consumer Price Index.	Publicly available (cited in the Reports of Tricia Yount) https://www.bls.gov/cpi/factsheets/medical-care.htm	
895.	<i>High-Grade municipal bonds</i> , Sept. 6, 2025 (U.S. Publishing Office; Congressional Committee Materials).	Publicly available (cited in the Reports of Tricia Yount)	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
896.	National Center for Health Statistics, National Vital Statistics Reps., Life Tables, Vol. 74, No. 6 (July 15, 2025)	Publicly available (cited in the Reports of Tricia Yount)	
897.	Social Security Administration. Cost of Living Adjustment (Dec. 2025)	Publicly available (cited in the Reports of Tricia Yount) https://www.ssa.gov/cola	
898.	Nat'l Archives & Recs. Admin., Code of Fed. Regs., <i>Combined Ratings Table</i> (Dec. 2025)	Publicly available (cited in the Reports of Tricia Yount) https://www.ecfr.gov/current/title-38/chapter-I/part-4/subpart-A/section-4.25	
899.	<i>Compensation & Pension, Rate Tables</i> , U.S. Dep't of Vet. Affairs (Dec. 2025)	Publicly available (cited in the Reports of Tricia Yount) https://www.knowva.ebenefits.va.gov/system/templates/selfservice/va_ssnew/help/customer/locale/en-	

		US/portal/554400000001018/topic/554400000005316/Rate-Tables	
900.	Rehabilitation Evaluation – <i>Mousser</i> – Shahnasarian, Michael Ph.D (Apr. 8, 2025)		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
901.	Update Life Care Plan – <i>Mousser</i> – Shahnasarian, Michael, Ph.D (May 23, 2025)		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
902.	Materials Considered – <i>Mousser</i> – Shahnasarian, Michael Ph.D (Apr. 14, 2025)		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross- examination at trial)
903.	<i>Curriculum vitae</i> of Andrew McIlroy	CLJA_USA_MCILRO Y_0000000001-4	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
904.	<i>Curriculum vitae</i> of Jadine Piper	CLJA_USA_PIPER_0 000000001-7	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
905.	<i>Curriculum vitae</i> of Shahnasarian, Michael Ph.D	Shahnasarian Dep. Ex. 1	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
906.	<i>Curriculum vitae</i> of Daniel J. Clarke, MSA	Clarke Dep. Ex. 4	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
907.	Intentionally Blank		
908.	<i>Curriculum vitae</i> of Nicholas Tackaberry, USA (Ret.), PhD(c), MBA, B.Sc.	Tackaberry Dep. Ex. 2	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at

			trial)
909.	Selected VBA records	00667_MOUSSER_VBA_000000 0364-365 00667_MOUSSER_VBA_000000 0366-369 00667_MOUSSER_VBA_000000 1063-1066 00667_MOUSSER_VBA_000000 1067-1068 00667_MOUSSER_VBA_000000 2661-2665 00667_MOUSSER_VBA_000000 2616-2618 00667_MOUSSER_VBA_000000 2772-2774 00667_MOUSSER_VBA_000000 2739-2741 00667_MOUSSER_VBA_000000 2736-2738 00667_MOUSSER_VBA_000000 2742-2744 00667_MOUSSER_VBA_000000 8174-8177 00667_MOUSSER_VBA_000000 8148-8151 00667_MOUSSER_VBA_000000 8680-8698 00667_MOUSSER_V BA_0000009473-9475	Objection — Completeness.
910.	VBA Records <i>Mousser</i>	00667_MOUSSER_V BA_0000031910-40563	Objection — Completeness.
911.	Expert Rep. – Henry Miller, Ph.D. (<i>Mousser</i>) (Dec. 15, 2025)		Objection — Fed R. Evid. 105, 403, 702; D.E. 864. Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross- examination at trial)
912.	Materials Considered List of Henry Miller, Ph.D (Dec. 22, 2025) (<i>Mousser</i>)		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross- examination at trial)
913.	<i>Curriculum vitae</i> of Henry Miller, Ph.D	MILLER_USA_00000 00001- MILLER_USA_00000 00008	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is

			subject to cross-examination at trial)
914.	U.S. Department of Veterans Affairs, VA Fee Schedule for Authorized Community Care	Publicly available (cited in the Reports of Henry Miller) https://www.va.gov/COMMUNITYCARE/revenue-ops/Fee-Schedule.asp	
915.	Medicare Payment Advisory Commission, Payment Basics Physician and Other Health Professional Payment System, November 2021.	Publicly available (cited in the Reports of Henry Miller) https://www.medpac.gov/wp-content/uploads/2021/11/medpacpaymentbasics21physicianfinalsec.pdf	
916.	Centers for Medicare & Medicaid Services, Clinical Laboratory Fee Schedule.	Publicly available (cited in the Reports of Henry Miller) https://www.cms.gov/medicare/payment/fee-schedules/clinical-laboratory-fee-schedule-clfs	
917.	Centers for Medicare & Medicaid Services, Web Price Inpatient IPPS	Publicly available (cited in the Reports of Henry Miller) https://webpricer.cms.gov/#/pricer/ipp	
918.	Centers for Medicare & Medicaid Services, Anesthesiologists Center Fee Schedule	Publicly available (cited in the Reports of Henry Miller) https://www.cms.gov/Center/Provider-Type/Anesthesiologists-Center.html	
919.	Centers for Medicare & Medicaid Services, CMS-1807-F, December 9, 2024.	Publicly available (cited in the Reports of Henry Miller) https://www.cms.gov/medicare/payment/fee-schedules/physician/federal-regulation-notices/cms-1807-f	
920.	Centers for Medicare & Medicaid Services, Skilled Nursing Facility PPS.	Publicly available (cited in the Reports of Henry Miller) https://www.cms.gov/medicare/payment/prospective-payment-systems/skilled-nursing-facility-snf	
921.	Centers for Medicare & Medicaid Services, Durable Medical Equipment Prosthetic Devices, Orthotics & Supplies Fee Schedule.	Publicly available (cited in the Reports of Henry Miller)	
922.	Home Health Prospective Payment System (HH PPS) Rate Update; Requirements for the HH Quality Reporting Program and the HH Value-Based Purchasing Expanded	Publicly available (cited in the Reports of Henry Miller)	

	Model; Durable Medical Equipment, Prosthetics, Orthotics, and Supplies (DMEPOS) Competitive Bidding Program Updates; DMEPOS Accreditation Requirements; and Other Medicare and Medicaid Policies. Centers for Medicare & Medicaid Services. November 28, 2025.		
923.	Medicare and Medicaid Programs; CY 2025 Payment Policies Under the Physician Fee Schedule and Other Changes to Part B Payment and Coverage Policies; Medicare Shared Savings Program Requirements; Medicare Prescription Drug Inflation Rebate Program; and Medicare Overpayments. Centers for Medicare and Medicaid Services. December 9, 2024.	Publicly available (cited in the Reports of Henry Miller)	
924.	Medicare Anesthesia Conversion Factors. Centers for Medicare & Medicaid Services.	Publicly available (cited in the Reports of Henry Miller)	
925.	Medicare Claims Processing Manual, Chapter 4, Section 10.8. Centers for Medicare & Medicaid Services. November 22, 2024.	Publicly available (cited in the Reports of Henry Miller)	
926.	Medicare Enrollment Dashboard. Centers for Medicare and Medicaid Services. August 2025.	Publicly available (cited in the Reports of Henry Miller)	
927.	Medicare Part D – Direct and Indirect Remuneration (DIR). Centers for Medicare & Medicaid Services. January 19, 2017.	Publicly available (cited in the Reports of Henry Miller)	
928.	Medicare Part D Drug Spending Dashboard. Centers for Medicare & Medicaid Services.	Publicly available (cited in the Reports of Henry Miller)	
929.	Methodology for Reimbursing Medical Services, Extended Care Services,	Publicly available (cited in the Reports of Henry Miller)	

	Pharmaceuticals, and Durable Medical Equipment Not on Medicare Fee Schedules. National Archives, Federal Register. March 27, 2024.		
930.	Centers for Medicare & Medicaid Services, Medicare Physician Fee Schedule.	Publicly available (cited in the Reports of Henry Miller) https://www.cms.gov/medicare/physician-fee-schedule/search/overview	
931.	Department of Veteran Affairs M21-1, Adjudication Procedures Manual	https://www.knowva.ebenefits.va.gov/system/templates/selfservice/va_ssnew/help/customer/locale/en-US/portal/554400000001018/topic/554400000004049/M21-1-Adjudication-Procedures-Manual	
932.	Department of Veteran Affairs Policy Letter 21-01 (Oct. 7, 2021) - Updated Guidance on Routine Future Examination Requests	https://www.knowva.ebenefits.va.gov/system/templates/selfservice/va_ssnew/help/customer/locale/en-US/portal/554400000001018/content/5544000000183159/Policy-Letter-21-01	
933.	Any demonstrative exhibits		Objection. Not identified. Plaintiff reserves all objections, including 403, 611(a), 1006, and foundation, until each demonstrative is disclosed.
934.	Expert Report of Dr. Walter Stadler 4/8/2025		Objection — Fed. R. Evid. 702, 703, 402, 403; D.E. 599. Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
935.	Supplemental Expert Report of Dr. Watler Stadler 5/15/2025		Objection — Fed. R. Evid. 702, 703, 402, 403; D.E. 599. Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)

936.	<i>Curriculum Vitae</i> of Dr. Walter Stadler		Objection — Fed. R. Evid. 702, 703, 402, 403; 802; D.E. 599. (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
937.	Materials Considered List of Dr. Walter Stadler (Mousser)		Objection — Fed. R. Evid. 702, 703, 402, 403; D.E. 599. Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
938.	Supplemental Materials Considered List of Dr. Walter Stadler (Mousser)		Objection — Fed. R. Evid. 702, 703, 402, 403; D.E. 599. Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial).
939.	Expert Report of Dr. Duncan Johnstone 4/8/2025		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
940.	February 2026 <i>Curriculum Vitae</i> of Dr. Duncan Johnstone		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
941.	Materials Considered List of Dr. Duncan Johnstone		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
942.	Supplemental Materials Considered List of Dr. Duncan Johnstone		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay

			objection if witness is subject to cross-examination at trial)
943.	Expert Report of Dr. Harold Bursztajn 4/8/2025		Objection — Fed. R. Evid. 702, 703, 402, 403; D.E. 612. Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
944.	Supplemental Expert Report of Dr. Harold Bursztajn 5/23/2025		Objection — Fed. R. Evid. 702, 703, 402, 403; D.E. 612. Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
945.	Materials Considered List of Dr. Harold Bursztajn		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
946.	Expert Report of Lisa A. Bailey, Ph.D. (Mousser) 4/8/2025		Objection — Fed. R. Evid. 702, 703, 402, 403, D.E. 624. Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
947.	Materials Considered for Expert Reports of Lisa A. Bailey, Ph.D. (Specific Causation – Bladder Cancer, Kidney Cancer, Leukemia, and Non-Hodgkin's Lymphoma) dated April 15, 2025		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
948.	Supplemental Materials Considered List Expert Reports of Lisa Bailey, PhD –		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay

	June 30, 2025		objection if witness is subject to cross-examination at trial)
949.	Second Supplemental Materials Considered List Expert Reports of Lisa Bailey, PhD – May 19, 2026		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
950.	Expert Report of Judy S. LaKind, Ph.D. (Mousser) 4/8/2025		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
951.	Supplemental Expert Report of Judy S. LaKind, Ph.D. (Mousser) 4/18/2025		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
952.	Judy S. LaKind, Ph.D. Attachment 1 to Mousser Report		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
953.	Errata – Expert Reports of Judy S. LaKind, Ph.D. 5/28/2026		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
954.	Expert Reports of Judy S. LaKind, Ph.D. [Specific Causation – Bladder Cancer, Kidney Cancer, Leukemia and Non-Hodgkin Lymphoma Plaintiffs] Materials Considered List – April 15, 2025		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
955.	Supplemental Materials Considered List Expert Report of Judy S. LaKind, Ph.D. – July 9, 2025		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
956.	Second Supplemental Materials Considered List Expert Report of Judy S.		Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay

	LaKind, Ph.D. – May 19, 2026		objection if witness is subject to cross-examination at trial)
957.	FRE 1006(a) Summary Chart – Exposure – Judy LaKind, Ph.D. – <i>Mousser v. United States</i>	To be provided	Reserve objection until document provided.
958.	January 31, 2025 Declaration of Frank Mousser		
959.	Diagnostic and Statistical Manual of Mental Disorders-5-TR: Preface (Pages i-xxvi)		Objection — Fed. R. Evid. 702, 703, 402, 403, D.E. 612.
960.	Diagnostic and Statistical Manual of Mental Disorders-5-TR: Major Depressive Disorder (Pages 183-193)		Objection — Fed. R. Evid. 702, 703, 402, 403, D.E. 612.
961.	Diagnostic and Statistical Manual of Mental Disorders-5-TR: Adjustment Disorders (Pages 319-322)		Objection — Fed. R. Evid. 702, 703, 402, 403, D.E. 612.
962.	Diagnostic and Statistical Manual of Mental Disorders-5-TR: Opioid Use Disorder (Pages 608- 615)		Objection — Fed. R. Evid. 702, 703, 402, 403, 802, 802(18) D.E. 612.
963.	Diagnostic and Statistical Manual of Mental Disorders-5-TR: Obstructive Sleep Apnea Hypopnea (Pages 429-435)		Objection — Fed. R. Evid. 702, 703, 402, 403, D.E. 612.
964.	Casarett and Doull's Toxicology: The Basic Science of Poisons (Ninth Edition). (Ed.: Klaassen, CD), McGraw-Hill Education, New York, NY.		Objection — Fed R. Evid. 802
965.	Sept. 26, 2024 Morris Maslia Deposition Exhibit 6 - ATSDR document entitled "Camp Lejeune, Summary of the Water Contamination Situation at Camp Lejeune"		
966.	Intentionally Blank		
967.	Aral, Mustafa M. Environmental Modeling and Health Risk Analysis (ACTS/RISK). Springer, 2010.		Objection — Fed R. Evid. 802
968.	Feb. 25, 2025 Leonard Konikow Deposition Exhibit 7 - The Handbook of		Objection — Fed R. Evid. 802

	Groundwater Engineering, Chapter 20 by Lenoard Konikow		
969.	1952 Camp Lejeune Base Guide	Base_Guides_0000000058 - 76	
970.	The Globe dated December 2, 1948	BRIGHAM_USA_0000010166 - 73	Fed. R. Evid. 402, 403, 802
971.	The Globe, Sept. 13, 1951	BRIGHAM_USA_0000012219 - 26	Fed. R. Evid. 402, 403, 802
972.	1982 Sampling Rep. by E. Betz	CLJA_WATERMODELING_07-0001176746	
972a.	Sept. 26, 2024 Morris Maslia Deposition Exhibit P-1 - ATSDR document entitled "Camp Lejeune, Summary of the Water Contamination Situation at Camp Lejeune"	CLJA_WATERMODELING_01-0000003764 – 3792	
973.	Sept. 26, 2024 Morris Maslia Deposition Exhibit D-11, Appendix I5, Disclaimer	CLJA_HEALTHEFFECTS-0000061127	
974.	Mar. 13, 2025 Morris Maslia Deposition Exhibit D-23, Clement Groundwater Article	CLJA_WATERMODELING_01-0000092109 - 92111	
975.	Feb. 6, 2025, Mustafa Aral Deposition Government Exhibit 18 – Sept. 21, 2011 Email Exchange between M. Aral, M. Maslia, and R. Faye	CLJA_ATSDR_BOVE-0000014214 - 14215	Fed. R. Evid. 402, 403, 802
976.	Sept. 26, 2024 Morris Maslia Deposition Exhibit D-18, Oct. 26, 2009 Maslia Email Exchange	CLJA_WATERMODELING_01-09-0000035889-90	Fed. R. Evid. 402, 403, 802
977.	Sept. 26, 2024 Morris Maslia Deposition Exhibit D-19, Jan. 21, 2010 Maslia Email Exchange	CLJA_WATERMODELING_01-09-0000036013	Fed. R. Evid. 402, 403, 802
978.	<i>Curriculum vitae</i> of Dr. Wang Ji, M.D.	ESI Protocol-compliant production to be provided	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
979.	Any exhibits listed by Plaintiff		
980.	Fourth Supplemental Materials Considered List, Expert Report of Dr. Wang Ji., M.D.	ESI Protocol-compliant production to be provided	
981.	Third Supplemental Materials Considered List, Expert Report of Tricia Yount	ESI Protocol-compliant production to be provided	

982.	<i>Curriculum vitae</i> of Dr. Michael Shahnasarian	ESI Protocol-compliant production to be provided	
983.	<i>Curriculum vitae</i> of Tricia Yount	ESI Protocol-compliant production to be provided	
984.	Second Supplemental Materials Considered List, Expert Report of Duncan Johstone, M.D.	ESI Protocol-compliant production to be provided	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
985.	Second Supplemental Materials Considered List, Expert Report of Walter Stadler, M.D.	ESI Protocol-compliant production to be provided	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
986.	<i>Curriculum vitae</i> of Alex Spiliotopoulos	ESI Protocol-compliant production to be provided	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
987.	<i>Curriculum vitae</i> of Julie Goodman	ESI Protocol-compliant production to be provided	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
988.	<i>Curriculum vitae</i> of Peter Shields	ESI Protocol-compliant production to be provided	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
989.	<i>Curriculum vitae</i> of John Lipscomb	ESI Protocol-compliant production to be provided	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
990.	<i>Curriculum vitae</i> of Judy LaKind	ESI Protocol-compliant production to be provided	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
991.	<i>Curriculum vitae</i> of Lisa Bailey	ESI Protocol-compliant production to be provided	Fed. R. Evid. 402, 403, 802 (PLG will withdraw

			hearsay objection if witness is subject to cross-examination at trial)
992.	Second Supplemental Materials Considered List of Julie E. Goodman, Ph.D. – Kidney Cancer – October 2026	ESI Protocol-compliant production to be provided	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
993.	Supplemental Materials Considered List Dr. Lipscomb – October 2026	ESI Protocol-compliant production to be provided	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
994.	<i>Curriculum vitae</i> of Duncan Johstone, M.D.	ESI Protocol-compliant production to be provided	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)
995.	<i>Curriculum vitae</i> of Walter Stadler, M.D.	ESI Protocol-compliant production to be provided	Fed. R. Evid. 402, 403, 802 (PLG will withdraw hearsay objection if witness is subject to cross-examination at trial)

V. DEPOSITION DESIGNATIONS

A. Plaintiff

Deposition Designations		
Deposition of Daniel Clark		
Begin (Page : Line)	End (Page : Line)	The United States' Objections
44:18	47:2	
110:12	112:1	
99:12	103:14	FRE 401, 402, 403
114:7	116:23	[115:10–116:1] FRE 701
121:20	124:3	No objection
138:13	142:24	FRE 401, 402, 403
The United States' Counter Designations – Daniel Clark		

Begin (Page: line)	End (Page: line)	PLG Objection to Counter- Designations
37:22	38:20	
Deposition of Dr. Wang Ji		
Begin (Page : Line)	End (Page : Line)	The United States’ Objections
91:3	93:5	[92:5–93:5] FRE 401, 402, 403; 91:3–92:5 no objection
120:7	120:21	
138:22	141:4	[140:6–141:4] FRE 401, 402, 403; [138:22–140:5] no objection
The United States’ Counter Designations – Dr. Wang Ji		
Begin (Page: line)	End (Page: line)	PLG Objection to Counter- Designations
62:25	64:21	
Deposition of Heather Ford		
Begin (Page : Line)	End (Page : Line)	The United States’ Objections
212:4	212:15	FRE 401, 402, 403, outside the scope of non-retained expert witness designation FRCP 26(a)(2)(C)
213:3	213:16	FRE 401, 402, 403, outside the scope of non-retained expert witness designation FRCP 26(a)(2)(C)
The United States’ Counter Designations – Heather Ford		
Begin (Page: line)	End (Page: line)	PLG Objection to Counter- Designations
22:24	23:16	
Deposition of Dr. Henry Miller		
Begin (Page : Line)	End (Page : Line)	The United States’ Objections

78:10	79:9	[78:10–79:9] FRE 401, 402, 403; Incomplete
95:13	96:3	[95:13–96:3] FRE 401, 402, 403; Incomplete
146:7	148:13	[146:7–25; 147:25–148:13] FRE 401, 402, 403; Incomplete
The United States’ Counter Designations – Henry Miller		
Begin (Page: line)	End (Page: line)	PLG Objection to Counter- Designations
70:10	70:24	
71:7	71:15	
76:5	76:22	
77:21	78:9	
95:3	95:12	
96:4	98:6	
143:1	145:15	
148:23	149:13	
151:14	152:12	
153:12	153:18	
237:9	240:13	
Deposition of Tricia Yount		
Begin (Page : Line)	End (Page : Line)	The United States’ Objections
268:23	269:2	[255:2–25; 266:21–273] Incomplete;
269:22	270:3	[255:2–25; 266:21–273] Incomplete
The United States’ Counter Designations – Tricia Yount		
Begin (Page: line)	End (Page: line)	PLG Objection to Counter- Designations
171:12	171:25	
193:12	193:25	

Deposition of Jadine Piper		
Begin (Page : Line)	End (Page : Line)	The United States’ Objections
242:1	244:15	Incomplete – should begin 241:23; no other objection
The United States’ Counter Designations – Jadine Piper		
Begin (Page: line)	End (Page: line)	PLG Objection to Counter- Designations
245:11	246:18	
Deposition of Andrew McIlroy		
Begin (Page : Line)	End (Page : Line)	The United States’ Objections
176:8	177:12	Beyond scope of assignment – FRCP 26(a)(2)(C)
The United States’ Counter Designations – Andrew McIlroy		
Begin (Page: line)	End (Page: line)	PLG Objection to Counter- Designations
52:2	54:7	
Deposition of Frank Bove		
Begin (Page : Line)	End (Page : Line)	The United States’ Objections
All	All	<p>October 17, 2024 Deposition (“Bove Vol. I”):</p> <p>[50:12–22] FRE 401, 402, 403</p> <p>[103:25–104:12] FRE 611 compound, assumes facts not in evidence, ambiguous</p> <p>[123:7–124:17] FRE 401, 402, 403</p> <p>[132:3–15] FRE 611 calls for legal conclusion</p>

		[168:17–173:22] FRE 401, 402, 403 October 18, 2024 Deposition ("Bove Vol. II"): no objections
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B. The United States

Deposition Designations		
March 8, 2024 Deposition of Heather Mouser (Plaintiff Objects to the use of any portion of this transcript, other than for impeachment, because Heather Mousser will be present and testify at trial. See FRCP 32.)		
Begin (Page : Line)	End (Page : Line)	PLG Objections
6:6	6:9	Plaintiff Objects to the use of any portion of this transcript, other than for impeachment, because Heather Mousser will be present and testify at trial. <i>See</i> FRCP 32.
13:7	13:8	
13:11	13:23	
14:1	14:8	
16:1	17:8	
19:12	20:14	Speculation
21:3	21:4	
23:10	23:25	
25:24	26:15	
26:17	27:5	
28:23	30:10	Calls for expert testimony, speculation
31:13	31:16	
36:24	37:2	
37:17	38:2	Completeness
38:4	38:11	Completeness, 38:22-29:2, 40:5-11
39:17	40:11	
41:18	43:12	Speculation, calls for expert testimony
53:7	53:13	

56:15	57:3	Foundation, calls for speculation, calls for expert testimony
64:11	64:17	Foundation, calls for speculation
64:21	65:5	Foundation, speculation
65:9	65:11	Speculation
70:20	71:17	Speculation
PLG's Additional Counter Designations – Heather Mousser		
Begin (Page: line)	End (Page: line)	The United States' Objection to Counter-Designations
38:22	39:2	
40:5	40:11	
61:11	61:17	Incomplete without question starting at 61:7; Compound question
August 1, 2024 Deposition of Ricard Mercer		
Begin (Page : Line)	End (Page : Line)	PLG Objections
5:12	5:15	
5:22	5:25	
7:20	8:5	
13:16	15:4	
15:6	16:4	
16:9	17:16	
17:20	19:15	
20:16	22:10	Foundation, hearsay, lack of personal knowledge regarding diagnosis, best evidence is medical records
22:13	23:13	Speculation, foundation, completeness Counter 45:20-46:4; 41:17-22
25:1	26:9	Speculation, foundation, lack of personal knowledge, improper lay opinion, relevance, compounding, leading
27:16	30:4	Speculation, lack of personal knowledge, Counter 28:9-16; 29:10-12
31:23	31:24	

32:4	32:16	
33:11	37:21	Speculation, foundation, improper lay opinion
37:23	39:5	Speculation, lack of foundation, vague as to “marital issues” lack of personal knowledge concerning private marital matters
39:10	42:22	Speculation, hearsay, Counter 41:17-22;
43:3	44:2	
PLG’s Additional Counter Designations – Ricard Mercer		
Begin (Page: line)	End (Page: line)	The United States’ Objection to Counter-Designations
28:9	28:16	
29:10	29:12	
41:17	41:22	
45:20	46:4	
July 24, 2024 Deposition of Dr. Andrew Rockwood		
Begin (Page : Line)	End (Page : Line)	PLG Objections
5:17	5:24	
9:4	9:8	
12:19	13:17	
13:23	14:2	
14:18	15:17	
19:22	20:10	Relevance, speculation
20:24	21:6	
21:14	21:18	
22:14	24:23	
25:3	25:10	
26:17	26:20	
27:2	27:21	
28:25	30:8	Speculation, outside scope as treater, Counter 32:23-34:8; 114:15-25
30:14	31:19	Outside scope as treating physician, misleading conflation of general risk factor with specific causation
31:14	32:12	
32:17	37:1	Relevance

37:5	37:17	
37:23	38:22	
39:4	39:13	
39:20	39:22	
40:17	41:2	
41:6	41:20	
43:8	43:15	
44:6	44:7	
44:12	45:7	
46:10	46:16	
47:8	47:18	
48:23	48:25	
49:16	51:14	
54:12	55:7	
55:13	56:1	
74:12	74:14	
74:19	75:14	
75:19	80:22	
82:6	82:17	
84:10	84:15	
85:9	87:7	
87:18	90:2	
90:25	92:14	
93:2	94:4	
94:9	96:2	
97:7	97:12	
97:14	98:7	
98:20	99:6	
100:4	100:17	Foundation, speculation, outside scope of treating testimony, calls for expert opinion, outside demonstrated specialty
101:4	101:21	Lack of foundation, speculation, outside scope of treating testimony, calls for expert opinion, outside demonstrated specialty
102:11	105:16	Lack of foundation, speculation, outside scope of treating testimony, calls for expert opinions, outside demonstrated specialty
106:5	106:9	

107:2	107:17	Speculation, outside scope of treating testimony, calls for expert opinions, completeness
108:7	110:2	Speculation, lack of foundation
PLG's Additional Counter Designations – Dr. Andrew Rockwood		
Begin (Page: line)	End (Page: line)	The United States' Objection to Counter-Designations
26:1	26:23	Leading (all questions); FRE 701-702
55:13	55:25	Incomplete
88:18	89:12	
92:15	92:22	Ambiguous; FRE 701-702
100:18	101:3	Speculation; FRE 701-702
108:4	108:19	
109:4	109:14	
111:2	112:10	Speculation; FRE 701-702; leading
112:22	114:6	Leading; FRE 701-702
114:15	114:25	Leading; FRE 701-702; Speculation; Assumes facts not in evidence
August 7, 2024 Deposition of Dr. Daniel K. Flood		
Begin (Page : Line)	End (Page : Line)	PLG Objections
8:6	8:10	
15:11	17:11	
21:13	24:11	Speculation, foundation, outside scope of treating physician testimony, undisclosed expert testimony
24:18	27:4	
27:6	27:22	
28:2	28:9	
28:16	29:14	
29:20	31:3	Relevance
39:1	43:8	Speculation, foundation, opinion outside scope of treatment
46:11	46:15	
50:5	53:5	
53:8	53:15	
53:17	54:7	

55:1	57:2	Lack of foundation, outside scope of treating physician testimony, undisclosed expert opinion as to risk estimate.
57:8	58:3	Medical causation opinion outside limited scope of treatment, foundation
58:5	60:24	Speculation, relevance
62:9	63:19	Speculation and foundation as to cause of back pain. Completeness,
65:10	67:3	
67:11	70:20	Speculation and foundation as to scarring; expert testimony outside scope of treatment as to 2024 record reviews.
73:6	73:8	
73:10	75:2	
77:11	78:16	Speculation
78:18	79:12	Vague, speculation
80:9	81:4	Beyond scope of treatment, foundation, undisclosed expert causation testimony,
82:12	82:23	
82:25	84:2	
84:11	84:14	
85:7	85:21	Relevance, cumulative
86:11	86:24	
87:1	88:17	
89:17	90:19	
91:16	91:23	
91:25	92:24	
94:8	95:11	Speculation, lack of foundation, undisclosed expert causation testimony
97:5	101:3	Speculation, lack of foundation, opinions outside of treatment, undisclosed expert testimony,
104:6	106:22	
107:19	109:21	Testimony by counsel
109:24	111:1	Opinions outside treatment period, undisclosed expert opinion, speculation, lack of foundation.

111:3	115:2	Undisclosed expert testimony, opinions outside scope of treatment, lack of foundation, use of external material during deposition, lack of authentication or disclosure as to website/calculator, unreliable application of methodology.
115:11	118:9	Improper expert opinion, opinions outside treatment period, speculation, foundation
118:11	120:1	Improper expert opinion, opinions outside scope of treatment, foundation,
121:8	122:4	Speculation, relevance, improper expert opinion, opinions outside scope of treatment
122:6	124:19	Improper expert opinions outside specialty, speculation, foundation, opinions outside scope of treatment
125:13	126:10	Improper expert opinions, foundation
PLG's Additional Counter Designations – Dr. Daniel K. Flood		
Begin (Page: line)	End (Page: line)	The United States' Objection to Counter-Designations
14:13	14:24	Leading
34:11	35:12	Leading
125:1	126:10	Speculation; FRE 701-702
129:7	130:2	Incomplete without question beginning at 124:20; speculation; FRE 701-702
130:12	132:5	FRE 701-702; speculation; conclusion
June 12, 2024 Deposition of Janet Mueller		
Begin (Page : Line)	End (Page : Line)	PLG Objections
6:14	6:17	
10:7	10:10	

12:9	12:24	
13:2	13:8	
17:9	17:25	
18:3	18:16	
18:20	18:25	
19:5	19:25	
20:16	20:18	
21:13	21:16	
22:8	22:19	
23:5	23:11	
23:13	23:22	
23:24	24:1	
24:20	24:23	
48:15	48:18	
48:23	49:2	
51:13	51:16	
52:23	53:7	Speculation, completeness
64:7	64:9	
64:18	64:21	Completeness
65:10	65:17	Completeness
79:19	80:3	
80:12	80:15	
PLG's Additional Counter Designations – Janet Mueller		
Begin (Page: line)	End (Page: line)	The United States' Objection to Counter-Designations
24:2	24:12	FRE 701-702; speculation
52:16	52:22	FRE 701-702; speculation
64:22	65:9	FRE 701-702; assumes facts not in evidence
84:15	85:7	FRE 701-702; misleading; speculation; confusing; leading
June 10, and July 17, 2024 Deposition of David Savitz		
Begin (Page : Line)	End (Page : Line)	PLG Objections
David Savitz Vol. I		
5:14	5:16	
7:13	10:8	
10:25	11:3	

11:17	13:19	
16:8	16:18	
17:19	17:22	
18:5	18:12	
18:19	19:2	
21:4	24:9	
26:3	26:11	
27:16	28:12	
29:12	31:25	
32:10	33:21	
40:7	40:20	
41:3	42:2	
45:21	46:8	
46:17	46:25	
55:9	55:22	
56:12	57:1	
59:8	61:25	
63:10	63:22	
65:2	65:21	
66:18	66:25	
67:7	68:15	
69:9	69:18	
70:19	72:20	
74:11	76:2	
77:9	77:22	
78:8	78:18	
81:7	81:15	
81:23	82:22	
83:16	85:15	
87:17	90:4	
90:19	92:11	
92:21	94:21	
100:5	100:22	
102:5	104:22	
106:19	110:2	
110:16	110:20	
111:19	113:1	
114:15	117:24	
118:19	120:1	
123:10	124:14	
125:11	130:20	
134:19	138:23	
146:6	147:13	
149:14	150:10	

153:19	154:13	
155:7	156:16	
159:16	160:24	
161:24	163:11	
164:13	167:9	
170:11	175:16	
184:11	187:8	
187:14	188:25	
199:13	199:24	
David Savitz Vol. II		
38:16	44:2	
51:24	54:1	
PLG's Additional Counter Designations – David Savitz		
Begin (Page: line)	End (Page: line)	The United States' Objection to Counter-Designations
David Savitz Vol. I (6/10/24)		
10:9	10:11	
47:12	48:13	
67:1	67:6	
69:19	70:18	
73:22	74:10	
76:3	77:5	
77:23	78:7	
78:19	79:4	
79:19	80:2	
96:5	96:19	
104:23	105:22	
111:10	111:18	
117:25	118:18	
130:21	131:15	
133:4	134:17	
175:17	178:11	
193:2	193:22	
196:21	197:2	
207:4	209:6	
209:21	212:4	
David Savitz Vol. II (7/17/24)		
17:5	17:9	
21:2	21:5	
25:9	25:23	
30:25	31:19	
32:15	33:9	Lack of foundation
August 6, 2024 Deposition of Dan Waddill		

Begin (Page : Line)	End (Page : Line)	PLG Objections
7:22	18:17	
19:11	19:14	
23:3	23:23	
24:12	25:4	
26:10	26:19	
51:18	52:24	
69:18	69:24	
70:8	70:22	
84:21	85:11	
96:4	97:1	
98:6	98:16	
114:21	116:21	
119:10	120:7	
124:2	124:8	
127:19	128:5	
129:14	131:5	
132:14	135:22	
145:8	148:4	
157:11	158:18	
171:3	171:13	
172:15	173:5	
180:4	229:12	
230:3	235:12	

PLG's Counter Designations – Dan Waddill

Begin (Page: line)	End (Page: line)	The United States' Objection to Counter-Designations
25:5	26:7	
32:14	37:5	Relevance; FRE 401 & 402
37:21	38:25	
45:1	48:18	Relevance; FRE 401 & 402
97:2	98:5	
98:17	99:18	
117:1	119:9	
136:1	137:12	
140:16	142:19	
143:1	144:6	Incomplete without question starting at 142:23
149:3	151:8	
152:9	157:10	
158:19	160:21	Incomplete with complete answer from 160:22-25

169:1	171:2	
171:14	172:14	
173:6	174:12	
237:9	241:15	
245:19	250:12	
251:1	255:21	
August 27, 2025 Deposition of Nicholas Tackaberry		
Begin (Page : Line)	End (Page : Line)	PLG Objections
5:12	5:22	
11:7	11:20	
13:12	14:15	
17:5	21:15	
22:3	26:25	
33:7	36:13	
37:8	39:3	
42:6	42:10	
47:16	51:13	
55:3	55:25	
56:22	58:25	
61:20	63:7	
64:11	65:10	
69:8	69:18	Completeness, 79:5-82:16
71:6	72:18	Completeness, 72:19-79:4
82:17	85:9	Completeness, 81:13-82:16
98:6	99:15	
100:4	106:15	
110:24	111:10	
119:2	120:8	Fed. R. Evid. 602; 701; 702; FRCP 26(a)(2) and 37(c)(1). Mr. Tackaberry was not disclosed as an expert in the United States' December 15, 2025 Second Disclosure of Expert Testimony.
PLG's Additional Counter Designations – Nicholas Tackaberry		
Begin (Page: line)	End (Page: line)	The United States' Objection to Counter- Designations
31:12	32:23	Calls for legal opinion
79:5	82:16	

72:19	79:4	[72:19-73:10] Calls for speculation; [All] beyond rule of completeness
81:13	82:16	
108:6	108:21	Lack of foundation; calls for speculation
115:2	116:17	Lack of foundation
125:19	127:1	Lack of foundation; calls for speculation; beyond rule of completeness
128:14	129:21	Lack of foundation; calls for legal opinion and speculation; beyond rule of completeness
131:19	132:5	Lack of foundation; calls for legal opinion and speculation; beyond rule of completeness

February 24, 2026 Deposition of Andrew McIlroy

Begin (Page : Line)	End (Page : Line)	PLG Objections
10:7	10:9	Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
17:7	23:8	Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
23:20	27:1	Completeness, 27:2-28:9 Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
28:10	31:23	Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
32:11	34:9	Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
35:8	37:6	Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment

		Regarding Future Offsets (D.E. 860; D.E. 896)
39:17	40:12	Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
52:3	56:9	Hearsay in the event that the witness is not available for cross-examination. Completeness, 66:12-66:22 and 68:2-69:1 Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
60:15	61:24	Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
63:19	66:10	Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
71:7	73:7	Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
76:6	79:21	Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
81:20	82:4	Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
86:3	88:13	Completeness, 85:16-85:19 and 100:5-101:4

		Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
90:1	91:7	Completeness, 101:5-103:17 Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
93:14	97:11	Completeness, 97:12-98:12 Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
128:11	129:20	Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
130:6	131:18	Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
132:23	134:12	Completeness, 134:13-135:13 Fed. R. Evid. 401; 402; 403; 602; 701; 702; FRCP 26(a)(2)(C) and 37(c)(1). Testimony concerns VHA material cost accounting and budget estimating, which is outside the scope of Mr. McIlroy's disclosed opinions. Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)

149:10	151:5	Completeness, 151:6-153:9 and 156:20-157:19 Objection on the grounds set forth in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896)
PLG's Additional Counter Designations – Andrew McIlroy		
Begin (Page: line)	End (Page: line)	The United States' Objection to Counter-Designations
27:2	28:2	Should end at 28:1; lack of foundation; beyond rule of completeness
53:11	53:22	
66:12	66:22	
68:2	69:1	Calls for legal opinions or speculation; exceeds scope of designation
85:16	85:19	Calls for legal opinions or speculation; lack of foundation
97:12	98:12	Beyond rule of completeness
98:13	99:18	Calls for legal opinions or speculation; lack of foundation
100:5	101:4	Calls for legal opinions or speculation; lack of foundation
101:5	103:17	Calls for legal opinions; lack of foundation
115:8	116:19	Calls for legal opinions or speculation; objections of counsel; lack of foundation
118:13	118:22	Improper designation; not testimony of witness
134:13	135:13	
137:13	137:21	Lack of foundation; exceeds scope of witness designation
139:6	139:21	Lack of foundation; exceeds scope of witness designation
140:15	140:21	Improper designation; not testimony of witness

143:16	147:2	Exceeds scope of witness designation; lack of foundation
151:6	153:9	Exceeds scope of witness designation; calls for legal opinion [153:5-9]
154:13	155:9	
155:10	156:19	Calls for legal opinions or speculation
156:20	157:19	Calls for legal opinions or speculation
167:22	168:9	Calls for legal opinions or speculation
169:13	170:8	Exceeds scope of witness designation; lack of foundation
172:22	174:16	Calls for legal opinions or speculation [174:8-16]; incomplete, misleading
180:22	181:21	
183:12	183:16	Incomplete; misleading; beyond rule of completeness

VII. WITNESSES

A. Plaintiff

NAME	ADDRESS	PROPOSED TESTIMONY	OBJECTIONS
Frank Mousser	612 Ashers Place, Seguin, TX 78155.	All case issues including exposure and damages.	
Steven B. Bird, MD	6 Laurel Ridge Lane Shrewsbury, MA 01545	This expert may be called upon to offer opinion testimony on the subjects of general causation and kidney cancer.	Expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 574, 609, 886, 890]
Matthew Cooper, MD	Medical College of Wisconsin, Division of Transplant Surgery, The Mark B. Adams Chair in Surgery 9200 West Wisconsin Avenue Director, Solid	This expert may be called upon to offer opinion testimony on Mr. Mousser's need for a kidney transplant and dialysis, Mr. Mousser's life expectancy, and Mr. Fryar's life care plan.	Expert opinions unhelpful and unreliable, FRE 702 & 703; objection to undisclosed expert opinion under Federal Rule of Civil Procedure 26 & 37

	Organ Transplantation Service Line Milwaukee, WI 53226 17045 Hidden Creek Court, Brookfield, WI 53005		
Joseph Del Pizzo, MD	Brady Urologic Associates - New York-Presbyterian Hospital 525 E 68 th Street, Starr 918 New York, N.Y. 10021	This expert may be called upon to offer opinion testimony on the subjects of specific causation and kidney cancer.	Expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 569]
Michael A. Fryar, M.S., CRC, QRP, RN, CCM, CLCP	YA Engineering Services, LLC PO Box 95922 Chicago, IL 60694-5922	This expert may be called upon to offer opinion testimony on the subjects of damages and offsets, and kidney cancer.	Objection to undisclosed expert opinion under Federal Rule of Civil Procedure 26 & 37 to the extent related to offsets
Kathleen M. Gilbert, PhD	240 West 75th Street, Apt 1B New York, NY 10023 800 Shire Court Fort Collins, CO 805	This expert may be called upon to offer opinion testimony on the subjects of general causation and kidney cancer.	Expert opinions unhelpful and unreliable, FRE 702 & 703
Benjamin Hatten, MD, MPH	Toxicology Associates 26 W Dry Creek Circle, Suite 815 Littleton, CO 80120 Anschutz Medical Campus Department of Emergency Medicine Leprino Building, 7th Floor Campus Box B-21512401 E. 17th Avenue, Aurora, CO 80045	This expert may be called upon to offer opinion testimony on the subjects of general causation and kidney cancer.	Expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motions to Exclude [D.E. 574, 609; 886; 890]
Morris L. Maslia, P.E.,	M.L. Maslia Consulting	This expert may be called to offer opinion testimony	Expert opinions unhelpful and unreliable, FRE 702 & 703;

D.WRE, DEE, Fellow EWRI	3360 Norfolk Chase Drive Peachtree Corners, GA 30092	regarding the contaminants in the finished water at U.S. Marine Corps Base Camp Lejeune from 1953 to 1987.	expert opinion subject to United States Motion to Exclude [D.E. 367]
Heather Mousser	206 Crestwood Drive Kerrville, TX 78028	Plaintiff's wife has personal knowledge about Plaintiff's health prior to <u>his</u> kidney cancer diagnosis, has personal knowledge about Plaintiff's kidney cancer diagnosis, care and treatment, and has personal knowledge about Plaintiff's current state of health.	
Kelly A. Reynolds, MSPH, PhD	Mel and Enid Zuckerman College of Public Health 295 N. Martin Avenue Tucson, AZ 85724	This expert may be called upon to offer opinion testimony the subjects of water contamination exposure levels, water ingestion modelling, and specific causation.	Expert opinions unhelpful and unreliable, FRE 702 & 703; objection to undisclosed expert opinion under Federal Rule of Civil Procedure 26 & 37 to the extent related to specific causation.
David Sabatini, PhD, PE, BCEE	1632 Crestmont Avenue Norman, OK 7306	This expert may be called upon to offer testimony regarding the contaminant concentration levels in finished water at Camp Lejeune from 1953 to 1987.	Expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 367]
Armine K. Smith, MD	Johns Hopkins University School of Medicine 5215 Loughboro Road Northwest, Suite 150 Washington, DC 20016	This expert may be called upon to offer opinion testimony on the subjects of specific causation and kidney cancer.	Expert opinions unhelpful and unreliable, FRE 702 & 703; expert opinion subject to United States Motion to Exclude [D.E. 569]
Chad L. Staller, J.D., MBA, MAC, CVA	The Center for Forensic Economic Studies 30 Washington Avenue, Suite B2 Haddonfield, NJ 08033	This expert may be called upon to offer opinion testimony and rebuttal opinion testimony on the subjects of damages and offsets, and kidney cancer.	Objection to undisclosed expert opinion under Federal Rule of Civil Procedure 26 & 37 to the extent related to offsets

B. The United States

NAME	ADDRESS	PROPOSED TESTIMONY	LIVE VS DESIGNATED	PLG'S OBJECTION
Dr. Alexandros Spiliotopoulos	Previously Provided *All communications must be through counsel*	Dr. Spiliotopoulos may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding the subject matter of water modeling, including his evaluation of the intended purpose, data limitations, reliability, and accuracy of ATSDR's Camp Lejeune water models.	Live	FRE 702 and <i>Daubert</i>
Dr. Remy Hennet	Previously Provided *All communications must be through counsel*	Dr. Hennet may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding the timing and extent of water contamination at Camp Lejeune and his evaluation of the data limitations, reliability, and accuracy of ATSDR's Camp Lejeune water models.	Live	FRE 702 and <i>Daubert</i>
Dr. Jay Brigham	Previously Provided *All communications must be through counsel*	Dr. Brigham may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding the history of Marine Corps Base Camp Lejeune and the water treatment plants that may have supplied contaminated water during the statutory period, and the water treatment plants that were not affected by the contaminants at issue. Dr. Brigham may also	Live	

		offer testimony concerning where water buffaloes at Camp Lejeune were filled; and the opening date of ABC One-Hour Cleaners, which was identified as the source of contamination for Tarawa Terrace.		
Dr. Ari Kelman	Previously Provided *All communications must be through counsel*	Dr. Kelman may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding the methodology for conducting historical analyses.	Live	
Dr. Julie Goodman	Previously Provided *All communications must be through counsel*	Dr. Goodman may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding general causation for the chemicals at issue in this litigation.	Live	FRE 702 and <i>Daubert</i>
Dr. Peter Shields	Previously Provided *All communications must be through counsel*	Dr. Shields may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding carcinogenesis and the general causation methodologies and opinions of plaintiffs' experts regarding the chemicals at issue in this litigation.	Live	FRE 702 and <i>Daubert</i>
Dr. Michael McCabe	Previously Provided *All communications must be through counsel*	Dr. McCabe may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding general causation for the chemicals at issue in the litigation.	Live	FRE 702 and <i>Daubert</i>

Dr. John Lipscomb	Previously Provided *All communications must be through counsel*	Dr. Lipscomb may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding the chemicals at issue in this litigation and regulatory standards and analysis related to the chemicals at issue in this litigation.	Live	
Dan Waddill	Previously provided	Dr. Waddill, the NAVFAC Atlantic Vieques Restoration Branch Head and former NAVFAC Environmental Restoration program supervisor, may offer fact and opinion testimony under Fed. R. Evid. 702, 703, or 705 regarding the subject-matter of water modeling. Dr. Waddill may offer fact and opinion testimony under Fed. R. Evid. 702, 703, or 705 regarding his work providing feedback about the limitations, reliability, and accuracy of ATSDR's Camp Lejeune water models.	Deposition designations	
Frank Bove	Previously provided	Dr. Bove, a former senior epidemiologist at ATSDR, may offer fact and opinion testimony under Fed. R. Evid. 702, 703, or 705 regarding ATSDR's health assessments and epidemiology studies related to Camp Lejeune, the use of ATSDR's Camp	Deposition designations	

		Lejeune water models to inform ATSDR's epidemiology studies, and the intended purpose of ATSDR's Camp Lejeune water models.		
David Savitz	Previously provided	Dr. Savitz, an epidemiologist and chairman of the NRC committee evaluating Camp Lejeune's water contamination, may offer fact and opinion testimony under Fed. R. Evid. 702, 703, or 705 regarding the NRC's evaluation related Camp Lejeune water contamination, including its evaluation on potential health effects and its review of ATSDR's Camp Lejeune water models.	Deposition designations	
Dr. Walter Stadler	Previously Provided *All communications must be through counsel*	Dr. Stadler may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding specific causation, including the nature, diagnosis, and treatment of cancer, including renal cell carcinoma and upper tract urothelial carcinoma, and Plaintiff's prognosis.	Live	FRE 702 and <i>Daubert</i>
Dr. Duncan Johnstone	Previously Provided *All communications must be through counsel*	Dr. Johnstone may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding kidney function and chronic kidney disease, including the	Live	

		effects of Plaintiff's cancer, treatment, and comorbidities on kidney function, Plaintiff's prognosis, future medical care, and life expectancy. Dr. Johnstone may also offer testimony regarding dialysis and kidney transplantation.		
Dr. Judy LaKind	Previously Provided *All communications must be through counsel*	Dr. LaKind may offer testimony under Fed. R. Evid. 702, 703, or 705 regarding exposure assessment for the chemicals at issue in this litigation.	Live	
Dr. Lisa Bailey	Previously Provided *All communications must be through counsel*	Dr. Bailey may offer testimony under Fed. R. Evid. 702, 703, or 705 on specific causation and how the alleged exposure to contaminants at Camp Lejeune compare to the relevant scientific literature	Live	FRE 702 and <i>Daubert</i>
Heather Mousser	Previously provided	Heather Mousser is Frank Mousser's wife. She may provide fact testimony regarding the issues of Mr. Mousser's alleged injuries and damages.	Deposition Designations	PLG objects to the deposition designation testimony of Heather Mousser as this designation does not comply with FRCP 32(a) and PLG intends on calling Ms. Mousser live
Richard Mercer	Previously provided	Richard Mercer is Frank Mousser's good friend and former employer. He may provide fact testimony regarding the issues of Mr. Mousser's alleged injuries and	Deposition Designations	PLG objects to the deposition designation testimony of Richard Mercer to the extent the testimony does not comply with

		damages.		FRCP 32(a)(1)(B) or (C)
Dr. Daniel Flood	Previously provided	Dr. Flood is one of Mr. Mousser's treating nephrologists. Dr. Flood may be called to offer fact and expert testimony under Fed. R. Evid. 702, 703, or 705 regarding his care and treatment of Mr. Mousser's chronic kidney disease and comorbidities. He may also testify regarding Mr. Mousser's chronic kidney disease prognosis and future medical care needs.	Deposition Designations	PLG objects to the deposition designation testimony of Daniel Flood to the extent the testimony does not comply with FRCP 32(a)(1)(B) or (C)
Dr. Andrew Rockwood	Previously provided	Dr. Rockwood is one of Mr. Mousser's treating urologists. Dr. Rockwood may be called to offer fact and expert testimony under Fed. R. Evid. 702, 703, or 705 regarding his care and treatment of Mr. Mousser's upper tract urothelial carcinoma, including the prognosis and future treatment needs related thereto.	Deposition Designations	PLG objects to the deposition designation testimony of Andrew Rockwood to the extent the testimony does not comply with FRCP 32(a)(1)(B) or (C)
Dr. Janet Mueller	Previously provided	Dr. Janet Mueller is Mr. Mousser's mental health provider. Dr. Mueller may be called to offer fact and expert testimony regarding Mr. Mousser's mental health conditions.	Deposition Designations	PLG objects to the deposition designation testimony of Janet Mueller to the extent the testimony does not comply with FRCP 32(a)(1)(B) or (C)

Dr. Harold Bursztajn	<p>Previously Provided</p> <p>*All communications must be through counsel*</p>	Dr. Harold Bursztajn may offer testimony under Fed. R. Evid. 702, 703, or 705 concerning the diagnosis, cause, prognosis, impact, and treatment needs regarding Mr. Mousser's mental health.	Live	FRE 702 and <i>Daubert</i>
Tricia Yount	<p>1000 Johnnie Dodds Boulevard, Suite 103-132 Mount Pleasant, SC 29464</p> <p>*All communications must be through counsel*</p>	Ms. Yount may offer expert testimony under Fed. R. Evid. 702, 703, or 705 regarding the value of the cancer Plaintiffs' alleged economic damages, past and future medical care that should offset any potential award, past and future VA disability compensation that should offset any potential award.	Live	
Dr. Wang Ji, M.D.	<p>1948 San Salvatore Place San Marino, CA 91108</p> <p>*All communications must be through counsel*</p>	Dr. Ji may offer expert testimony under Fed. R. Evid. 702, 703, or 705 regarding (i) rebutting the opinions of Marjorie Hackett-Wallace as to past medical expenses; (ii) offering opinions as to the amount of government healthcare benefits clinically related to the cancer Plaintiff's claimed conditions; and (iii) offering opinions as to clinically related VBA disability diagnoses or ratings applicable to Mr. Mousser.	Live	

Dr. Michael Shahnasarian, Ph.D.	<p>Previously provided</p> <p>*All communications must be through counsel*</p>	<p>Dr. Shahnasarian may offer expert testimony under Fed. R. Evid. 702, 703, or 705 regarding his vocational rehabilitation evaluations of Plaintiff, including Mr. Mousser's vocational histories, functional limitations, claimed loss of earning capacity, and anticipated rehabilitation and future care needs. Dr. Shahnasarian will also testify regarding the life care plan he prepared with input from medical experts, including the recommended treatment protocols and associated future care.</p>	Live	
Heather Ford (VHA)	<p>Previously provided</p> <p>*All communications must be through counsel*</p>	<p>Ms. Ford may offer fact and expert testimony under Fed. R. Evid. 702, 703, or 705 concerning the Veterans Health Administration (VHA) and Office of Integrated Veterans Care (IVC), which are part of the Department of Veterans Affairs, that it is reasonable to project that VHA will continue to provide healthcare to Veterans in the future, and that the general scope of care and eligibility for care are unlikely to be significantly constricted in the future.</p>	Live	

Andrew McIlroy (VBA)	<p>U.S. Department of Veterans Affairs 810 Vermont Ave., NW Washington, DC 20420</p> <p>*All communications must be through counsel*</p>	<p>Mr. McIlroy may offer fact and expert testimony under Fed. R. Evid. 702, 703, or 705 concerning the sources of funding of benefits programs that are administered by the Veterans Benefits Administration (VBA), which is part of the Department of Veterans Affairs.</p>	Designated, but may call live subject to witness availability	<p>If witness does not appear live, PLG objects to the deposition designation of Andrew McIlroy to the extent the testimony does not comply with FRCP 32(a)(1)(B) or (C)</p> <p>Plaintiff objects to the United States' designations of Mr. McIlroy's testimony to the extent they are offered to support a future VBA or VHA offset, for the reasons stated in Plaintiffs' Motion for Partial Summary Judgment Regarding Future Offsets (D.E. 860; D.E. 896), and reserves the right to supplement these objections after the Court rules on that motion.</p>
Jadine Piper (VBA)	<p>Previously provided</p> <p>*All communications must be through counsel*</p>	<p>Ms. Piper may offer fact and expert testimony under Fed. R. Evid. 702, 703, or 705 about Veterans' benefits administered by the Veterans Benefits Administration (VBA), which is part of the Department of Veterans Affairs, including opinions regarding the determination of eligibility for Veterans' benefits, the continuation of VBA disability compensation benefits into the future, and whether the scope</p>	Live	

		of such benefits may constrict in the future.		
Daniel Clarke (VHA)	U.S. Department of Veterans Affairs 100 Grandview Road Braintree, MA 02184 *All communications must be through counsel*	Mr. Clarke may offer testimony regarding the Veterans Health Administration (VHA) data that was extracted from database(s) maintained by or on behalf of the Department of Veterans Affairs and the calculations and valuation determinations for the health care costs provided to each kidney cancer Plaintiff receiving health care from the Department of Veterans Affairs.	Live	
Nick Tackaberry (VBA)	Previously Provided *All communications must be through counsel*	Mr. Tackaberry may offer testimony concerning disability compensation and disability rating data that was extracted from database(s) maintained by or on behalf of the Veterans Benefits Administration (VBA), which is part of the Department of Veterans Affairs, for each kidney cancer Plaintiff receiving disability compensation for injury(ies) claimed to be from or related to the water at Camp Lejeune.	Designated, but may call live subject to witness availability	If witness does not appear live, PLG objects to the deposition designation of Nick Tackaberry to the extent the testimony does not comply with FRCP 32(a)(1)(B) or (C)

VIII. TRIAL TIME ESTIMATE:

A. Plaintiff

Plaintiff estimates two (2) to three (3) days for the trial of this action, subject to the Court's guidance.

B. The United States

Given the number of witnesses and exhibits the parties have listed, the United States' position is that the minimum amount of trial time necessary for the individual cases is 24 hours for each side.

This 16th day of October, 2026.

Respectfully submitted,

/s/ J. Edward Bell, III

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APPROVED BY:

TERRENCE W. BOYLE
UNITED STATES DISTRICT JUDGE
_____, 2026.