

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 | ) |                                       |
|                               | ) | <b>PLAINTIFFS' LEADERSHIP GROUP'S</b> |
| This Document Relates To:     | ) | <b>REPORT AND STATUS UPDATE</b>       |
| ALL CASES                     | ) |                                       |
|                               | ) |                                       |

Plaintiffs' Lead and Co-Lead Counsel ("Plaintiffs' Leadership Group") respectfully provide this Honorable Court and the public with the following Report and Status Update.

(1) As required by this Court's July 19, 2023, Order (DE 10), Plaintiffs' Leadership Group convened, deliberated, and selected the members of the Plaintiffs' Executive Committee ("PEC") and Plaintiffs' Steering Committee ("PSC").

(2) Plaintiffs' Leadership Group presented to the Court the list of PEC and PSC members by letter dated July 27, 2023. The members of the PEC and PSC are as follows:

| Plaintiffs' Executive Committee                                                  |
|----------------------------------------------------------------------------------|
| Aimee Wagstaff, Wagstaff Law Firm                                                |
| John Bash, Quinn Emanuel Urquhart & Sullivan LLP                                 |
| Brian Barr, Levin Papantonio Rafferty Proctor Buchanan O'Brien Barr Mougey, P.A. |
| Jayne Conroy, Simmons Hanley Conroy                                              |
| Kevin Dean, Motley Rice                                                          |
| Lynwood Evans, Ward & Smith                                                      |
| Rhon Jones, Beasley Allen                                                        |
| Howard Nations, The Nations Law Firm                                             |
| Jim Onder, Onder Law                                                             |
| John Romano, Romano Law Group                                                    |
| Patrick Wallace, Milberg Coleman Bryson Phillips Grossman                        |
| Jay Ward, McGowan, Hood, Felder & Phillips                                       |
| Robert Kinsman, Krause and Kinsman Law Firm                                      |

| <b>Plaintiffs' Steering Committee</b>          |
|------------------------------------------------|
| Elliot Abrams, Cheshire Parker Schneider, PLLC |
| Janet Ward Black, Ward Black Law               |
| David Kirby, Edwards Kirby                     |
| Gary Jackson, James Scott Farrin               |
| Stacey Miller, Miller Law Group, PLLC          |
| Scott Overholt, Overholt Law Firm PC           |
| Adam Pulaski, Pulaski Kherkher, PLLC           |
| Roopal Luhana, Chaffin Luhana, LLP             |
| Alejandro Blanco, The Blanco Law Firm          |
| Greg Cade, Environmental Law Group             |
| Grant Davis, Davis, Bethune & Jones LLC        |
| Mark Mandell, Mandell Boisclair & Mandel Ltd.  |
| David A. Wenner, Snyder & Wenner, P.C          |
| Joseph Anderson, Pangia Law Group              |

(3) Plaintiffs' Leadership Group convened, deliberated, and organized the members of Plaintiffs' Leadership Group and those attorneys in the PEC and PSC into the various Subcommittees required by this Court's July 19, 2023 Order (DE 10).

(4) The Science and Experts Subcommittee met in person over two days on August 16 and August 17, 2023, and made extensive progress towards discussing the science that lies at the core of this litigation and the retention of necessary experts. The Discovery & ESI Subcommittee also met in-person and has begun inventorying relevant documents and data for use in this litigation. Other Subcommittees have met virtually and made substantial progress toward defining their respective tasks and objectives, and have begun executing on those.

(5) Government Liaison Counsel and other members of Plaintiffs' Leadership Group have exchanged with government counsel drafts of a Proposed Initial Case Management Order. They also convened a full-day meeting in Washington, DC, on August 15, 2023, to further negotiate the terms of that Proposed Order. Plaintiffs' Leadership Group will file a Proposed Initial Case Management Order on or before August 28, 2023, as indicated in the previous status update.

(6) Plaintiffs' Leadership Group and government counsel have discussed components of the Proposed Short Form Complaint and a final draft is nearly complete. The Proposed Master Complaint is also near completion.

(7) Plaintiffs' Leadership Group plan to launch a public-facing website, as ordered by the Court, by August 25, 2023, to keep the public apprised of the status of this litigation.

(8) Plaintiffs' Leadership Group intends to move for the entry of a proposed Common Benefit Order once the Proposed Initial Case Management Order is entered.

(9) A motion to reconsider (DE 13) this Court's July 19, 2023 Case Management Order appointing Plaintiffs' Leadership Group has been filed by a law firm out of South Carolina. Plaintiffs' Leadership Group will be filing an opposition to the motion by August 28, 2023.

(10) It is the intention of Plaintiffs' Leadership Group to file regular Reports and Status Updates, to keep the Court, counsel, Plaintiffs, and the public informed. Plaintiffs' Leadership Group intends to post these reports and other publicly filed information on the website that the Court has directed Plaintiffs' Leadership Group to establish and maintain for this purpose.

Respectfully submitted, this 18th day of August, 2023.

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