

Instructions for Discovery Profile Pool Form

Last updated December 15, 2023

Pursuant to the Order Regarding Discovery Pool Profile Form entered by the United States District Court for the Eastern District of North Carolina (the “Court”) on November 29, 2023, Docket Entry 62 (the “DPPF Order”), those plaintiffs selected as Track 1 Discovery Plaintiffs must complete the Discovery Pool Profile Form (“DPPF”) (copies are available online under the master docket, 7:23-cv-00897, at Doc. 61-1 and a fillable electronic version is available at the Plaintiffs’ Leadership public website under the Documents tab or by clicking [here](#) and two authorization forms (copies are available online under the master docket, 7:23-cv-00897, at Doc. 62-2, and fillable electronic versions is available at the Plaintiffs’ Leadership public website under the Documents tab or by clicking [here](#)) within 45 days from the entry of the DPPF or their selection as a Track 1 Discovery Plaintiff whichever is later.

If you have additional questions or concerns, please contact Matthew Mariani, Partner, Bell Legal Group at mmariani@belllegalgroup.com.

1. Important Dates

- DPPF packet is due to the Department of Justice for those named on the Joint Notice of Filing Track 1 Discovery Plaintiffs Selection entered on the Court’s docket on December 5, 2023, on or before January 19, 2024.
- The Plaintiffs’ Leadership Group (“PLG”) would like to review and submit all DPPF packets together and have time to review packets for completeness with time to correct issues, and, therefore, request that plaintiffs’ counsel provide completed DPPF packets to the PLG by Friday, January 12, 2024.

2. DPPF packet contents

The DPPF packet comprises the DPPF, the Plaintiff Certification, Form SF 180, VA Release Form 10-5345 and Affidavit VA Release Form. Signature requirements vary please contact the designated contact above for more information.

3. Social Media

The DPPF Order states: Track 1 Discovery Plaintiffs shall take reasonable efforts to preserve and maintain, without deletions or alterations, any content of any personal webpage(s) or social media accounts currently held by them, including but not limited to photographs, texts, links, messages and other postings or profile information that is relevant to the subject matter of this litigation. "Social media" includes, but is not limited to, Facebook, Myspace, LinkedIn, X (Twitter), Instagram, TikTok, Snapchat, Reddit and blogs. This provision does not mean that such social media information is relevant or discoverable.