

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

IN RE: )  
CAMP LEJEUNE WATER LITIGATION )  
 )  
This Pleading Relates to: )  
All Cases )

**PLAINTIFFS’ APPENDIX TO LOCAL CIVIL RULE 56.1 STATEMENT OF MATERIAL FACTS**

Pursuant to Local Civil Rule 56.1(a)(5), Plaintiffs submit the following Appendix to their Local Civil Rule 56.1 Statement of Undisputed Material Facts (“SUMF”) in support of their Motion for Partial Summary Judgment Regarding Future Offsets. The table below lists exhibits that are filed as attachments to this Appendix. Plaintiffs’ Motion and SUMF also cite documents the parties previously filed as part of the Parties’ Joint Appendix.

<b>Exhibit</b>	<b>Description</b>
A	Daniel Clarke’s Deposition Transcript
B	Kimberly Rivas’s Deposition Transcript
C	Diana Zakaryan’s Deposition Transcript
D	Kyle Westerlind’s Deposition Transcript

Dated: April 27, 2026.

/s/ J. Edward Bell, III

J. Edward Bell, III (admitted *pro hac vice*)  
Bell Legal Group, LLC  
219 Ridge St.  
Georgetown, SC 29440  
Telephone: (843) 546-2408  
jeb@belllegalgroup.com

*Lead Counsel for Plaintiffs*

/s/ W. Michael Dowling

W. Michael Dowling (NC Bar No. 42790)  
The Dowling Firm PLLC  
Post Office Box 27843  
Raleigh, NC 27611  
Telephone: (919) 529-3351  
mike@dowlingfirm.com

*Co-Lead Counsel for Plaintiffs*

/s/ James A. Roberts, III

James A. Roberts, III  
Lewis & Roberts, PLLC  
3700 Glenwood Ave., Ste. 410  
Raleigh, NC 27612  
Telephone: (919) 981-0191  
jar@lewis-roberts.com

*Co-Lead Counsel for Plaintiffs*

/s/ Elizabeth J. Cabraser

Elizabeth J. Cabraser (admitted *pro hac vice*)  
Lief Cabraser Heimann & Bernstein, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111  
Telephone: (415) 956-1000  
ecabraser@lchb.com

*Co-Lead Counsel for Plaintiffs*

/s/ Robin L. Greenwald

Robin L. Greenwald (admitted *pro hac vice*)  
Weitz & Luxenberg, P.C.  
700 Broadway  
New York, NY 10003  
Telephone: 212-558-5802  
rgreenwald@weitzlux.com

*Co-Lead Counsel for Plaintiffs*

/s/ Mona Lisa Wallace

Mona Lisa Wallace (N.C. Bar No.: 009021)  
Wallace & Graham, P.A.  
525 North Main Street  
Salisbury, NC 28144  
Tel: 704-633-5244  
mwallace@wallacegraham.com

*Co-Lead Counsel for Plaintiffs*