IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA SOUTHERN DIVISION No. []:[][]-cv-[][][][][]-[][]

IN RE: CAMP LEJEUNE WATER LITIGATION

THIS DOCUMENT RELATES TO:

DISCOVERY POOL PROFILE FORM

XXXXXX	Х	XXXXXX	XX
Plaintiff First	Middle	Last	Suffix

In completing this Discovery Pool Profile Form ("DPPF"), you must provide information that is true and accurate to the best of your knowledge. In completing this DPPF, you are under oath and subject to the penalties of perjury. The DPPF shall be completed pursuant to the September 26, 2023 *Case Management Order No. 2.* (Doc. 23). Plaintiff reserves the right to supplement all responses. For each question where the space provided does not allow for a complete answer, please attach additional sheets so that all answers are complete. Please answer each question and do not leave any blanks. If appropriate, you may respond in good faith that you do not know or do not recall. If you do not know or do not recall the information requested, please provide as much information as you can. All aspects of this DPPF are designated as "Confidential Information" and covered by the Protective Order, D.E. 36.

I. CLAIMANT INFORMATION

	. What is the DON Claim Number for the administrative claim (Short Form Complaint, Box 30)?		[][]	DE DE DE DE DE DE DE DE D	
	- /				DON has not yet assigned a claim
<i>E.g.</i> , <i>CLS</i> 2	E.g., CLS23-123456			num	
2. Who is completing this Discovery Pool Profile Form?			$\Box A$	Plaintiff or Plaintiff's Agent Attorney for Plaintiff or Attorney Plaintiff's Agent	
		being completed by an atto	rney, plea	se ide	entify the attorney:
	ey first name				
	ey last name				
	rm name ey address line 1				
	ey address line 2				
8. Attorn	·				
9. Attorn	ey state (abbrev.)			[][]]
	ey zip code				
11. Attorn	ey phone			([]]	
12. Attorn					
Resume un	niversal questions			,	
13. What	is the case number?				15.1 5.15.15.15.1
E.g., 7:23-	cv-12345			[]:[][]-cv-[][][][][]	
14. Which District Judge is assigned to the case?		□ H □ H	Hon. Richard E. Myers II Hon. Terrence W. Boyle Hon. Louise W. Flanagan Hon. James C. Dever III		
		he Plaintiff has used, if diffe	erent		
	hat in the case caption (e.g. identify the Plaintiff's Soc			<u>г 1г 1</u>	<u>ון ז-נ זר ז-נ זר זר זר ז</u> ר ז
10. 110050	dentify the Flammin S Soc	fai Security Number.			
17. Please identify the Plaintiff's date of birth.		MM	I/DD/YYYY		
18. Please	identify the Plaintiff's last	known address:	_		
18a. S	treet Address	18b. Town	18c. Sta (abbrev		18d. Year residence began (YYYY)
	Plaintiff began residing at t identify the next most rece	he above address <i>after</i> 2020	,		
	treet Address	19b. Town	19c. Sta (abbrev		19d. Year residence began (YYYY)
	-	t , did you assert a claim for you legally represent? (Box			To Me Someone Else

If you assert a claim fo	or injuries to SC	MEONE ELSE	, please des	cribe you	representation of	that person:
21. What is the nature of the representative's representation?				 Estate Admin Guardianship Conservatorsl Power of attor 	nip rney	
	□ Other:					
22. Has a court appoint	nted you as the	claimant's repre	sentative?		□ Yes □ No	
23. If yes, please desc 23a. Court Name			(al-1-mars)	22 - 5		4
		23b. Court State		230.1	Date of appointmen	<u>.</u>
Resume universal que:24. On your Short F deceased? (Box 7)	orm Complain)	t , did you assert	that the Pla	intiff is	□ Yes □ No	
If the Plaintiff is deceased: 1 2 3 4 5 6+ I do not know/do not recall 				/do not recall		
26. Please identify Pla If none, check here:	-			leath.		
26a. First name	26b. Middle Name	26c. Last name	26d. Suffix	26e. Rel Plaintiff	lationship to	26f. Year of birth
□ I do not know/do not recall	□ I do not know/do not recall	□ I do not know/do not recall	□ I do not know/do not recall	□ Chilo □ Spou □ Othe	ise	YYYY □ I do not know/do not recall
□ I do not know/do not recall	□ I do not know/do not recall	□ I do not know/do not recall	□ I do not know/do not recall	□ Child □ Spou □ Othe	Ise	YYYY □ I do not know/do not recall

□ I do not know/do not recall	□ I do not know/do not recall	□ I do not know/do not recall	□ I do not know/do not recall	□ Child □ Spouse □ Other:	YYYY □ I do not know/do not recall
□ I do not know/do not recall	□ I do not know/do not recall	□ I do not know/do not recall	☐ I do not know/do not recall	□ Child □ Spouse □ Other:	YYYY □ I do not know/do not recall
□ I do not know/do not recall	□ I do not know/do not recall	□ I do not know/do not recall	□ I do not know/do not recall	□ Child □ Spouse □ Other:	YYYY □ I do not know/do not recall

II. MILITARY SERVICE & DEPENDENT MEDICAL

a) Military service

Resume universal questions	
	□ Yes
27. Has Plaintiff ever served in a branch of the U.S. military?	□ No
	□ I do not know/do not recall
If the Plaintiff has previously served in the U.S. military:	
	□ WWI
	□ WWII
	□ Korea
20 Didde Disinfife and a main and a mide and of the fallowing	□ Vietnam
28. Did the Plaintiff's service overlap with any of the following conflict periods?	🗆 Persian Gulf
connet periods.	□ Other:
	\Box I do not know/do not recall
	\Box N/A (e.g., only served during
	peacetime)

	intiff's service number?		□ N/A (e.g., service after 1970) □ I do not know/do not recall
	f service, please identify:	20 1/	
30a. Service Branch	30b. Year service began	30c. Year service ended	30d. Officer or Enlisted
 Marine Corps Army Navy Air Force Coast Guard 	YYYY □ I do not know/do not recall	YYYY □ I do not know/do not recall	 Officer Enlisted Both I do not know/do not recall
 Marine Corps Army Navy Air Force Coast Guard 	YYYY □ I do not know/do not recall	YYYY □ I do not know/do not recall	 Officer Enlisted Both I do not know/do not recall
 Marine Corps Army Navy Air Force Coast Guard 	YYYY □ I do not know/do not recall	YYYY □ I do not know/do not recall	 Officer Enlisted Both I do not know/do not recall
 Marine Corps Army Navy Air Force Coast Guard 	YYYY □ I do not know/do not recall	YYYY □ I do not know/do not recall	 Officer Enlisted Both I do not know/do not recall

b) Veteran and dependent medical

Resume universal questions	
	□ Yes
31. Is/was Plaintiff a TRICARE beneficiary?	□ No
	\Box I do not know/do not recall
If the Plaintiff is or was a TRICARE beneficiary:	
	□ Yes
32. Did someone else sponsor the Plaintiff's TRICARE benefits?	□ No
	□ I do not know/do not recall
If someone else sponsored the Plaintiff's TRICARE Benefits	
33. Sponsor/Veteran First Name	
34. Sponsor/Veteran Middle Name	
35. Sponsor/Veteran Last Name	
36. Sponsor/Veteran SSN	[][][]-[][]-[][][][] □ I do not know/do not recall

	□ Marine Corps
	□ Army
27 Samer Weteren Drevel of Samia	🗆 Navy
37. Sponsor/Veteran Branch of Service	□ Air Force
	🗆 Coast Guard
	\Box I do not know/do not recall
	□ Child
	□ Mother
	□ Father
29 Claiment relationship with Spansor/Vataran	□ Mother-in-law
38. Claimant relationship with Sponsor/Veteran	□ Mother-in-law
	□ Stepfather
	□ Other:
	\Box I do not know/do not recall

Other Service/Employment

Resume universal questions				
39. On your Short Form Complaint, did you assert that the Plaintiff \Box Yes				
was a Civilian Employee of a P	rivate Company at Camp	No		
Lejeune? (Box 17)				
40. [If yes] Please identify:				
40a. Plaintiff's Employer	40b. Date employment began	40c. 1ate employment ended		
(Private Company)	400. Date employment began	40e. Tate employment ended		
	MM/DD/YYYY	MM/DD/YYYY		
\Box I do not know/do not recall	□ I do not know/do not recall	□ I do not know/do not recall		
	MM/DD/YYYY	MM/DD/YYYY		
\Box I do not know/do not recall	□ I do not know/do not recall	□ I do not know/do not recall		
	MM/DD/YYYY	MM/DD/YYYY		
□ I do not know/do not recall	□ I do not know/do not recall	□ I do not know/do not recall		
		Yes		
41. On your Short Form Complaint,	did you assert that the Plaintiff			
was a Civil Service Employee a	t Camp Lejeune? (Box 17)			
42. [If yes] Please identify:				
42a. Plaintiff's Employer				
(Agency)	42b. Date employment began	42c. Date employment ended		
	MM/DD/YYYY	MM/DD/YYYY		
\Box I do not know/do not recall	□ I do not know/do not recall	□ I do not know/do not recall		

	MM/DD/YYYY	MM/DD/YYYY
\Box I do not know/do not recall	□ I do not know/do not recall	□ I do not know/do not recall
	MM/DD/YYYY	MM/DD/YYYY
□ I do not know/do not recall	□ I do not know/do not recall	□ I do not know/do not recall

III. DISEASES AND ILLNESSES

Resume universal questions	
	□ Bladder cancer
	□ Kidney cancer
	🗆 Leukemia
	🗆 Non-Hodgkin's lymphoma
	□ Parkinson's disease
	□ Adverse Birth Outcomes
	\Box ALS
	□ Aplastic anemia or myelodysplastic
	syndromes
	\Box Bile duct cancer
	□ Brain/CNS cancer
	□ Breast cancer
	\Box Cardiac birth defects
	Cervical cancer
	□ Colorectal cancer
	□ Gallbladder cancer
	\Box Hepatic steatosis
43. What diseases or injuries does the claimant assert are related to	□ Hypersensitivity skin disorder
exposure to water at Camp Lejeune? (choose all that apply)	□ Infertility
	□ Intestinal cancer
	□ Non-cancer kidney disease
	🗆 Leukemia
	□ Liver cancer
	□ Lung cancer
	□ Multiple myeloma
	□ Neurobehavioral effects
	\Box Non-cardiac birth defects
	□ Ovarian cancer
	\Box Pancreatic cancer
	\Box Prostate cancer
	\Box Sinus cancer
	\Box Soft tissue cancer
	□ Systemic sclerosis/scleroderma
	□ Thyroid cancer
	□ Other:

44. I am completing this section as it relates to:	□ Bladder cancer
	☐ Kidney cancer
	Leukemia
	Non-Hodgkin's lymphoma
	□ Parkinson's disease
	□ Adverse Birth Outcomes
	\Box ALS
	□ Aplastic anemia or myelodysplastic syndromes
	□ Bile duct cancer
	□ Brain/CNS cancer
	□ Breast cancer
	□ Cardiac birth defects
	Cervical cancer
	□ Colorectal cancer
	□ Gallbladder cancer
	☐ Hepatic steatosis
	☐ Hypersensitivity skin disorder
	□ Infertility
	\Box Intestinal cancer
	□ Non-cancer kidney disease
	\Box Leukemia
	□ Liver cancer
	□ Lung cancer
	☐ Multiple myeloma
	□ Neurobehavioral effects
	\square Non-cardiac birth defects
	\Box Ovarian cancer
	\square Pancreatic cancer
	□ Prostate cancer
	\Box Sinus cancer
	\Box Soft tissue cancer
	Systemic sclerosis/scleroderma
	□ Thyroid cancer
	□ Other:
	□ Yes
45. Has a physician diagnosed the Plaintiff with this	\square No
injury?	\Box I do not know/do not recall
	\square N/A
46. If yes, when was Plaintiff first diagnosed this	MM/DD/YYYY
injury?	
	□ I do not know/do not recall
	□ N/A

a) Injury 1 – repeat questions for each injury asserted

47. Name of physician that first diagnosed the Plaintiff?					me I do not know/o N/A	do not recall			
48. Name of hospital or medical group of physician:				vian:	Name I do not know/do not recall N/A				
49. Do you allege that this Injury caused or contributed to the Plaintiff's death?					Yes No I do not know/o N/A	do not recall			
50.	group, and cit	y, state where	name of medical e treatment was re: No treatment						
	50a. First name, if known	50b. Middle Initial, if known	50c. Last name, if known	50d. Suff if knov	ïx,	50e. Medical Group	50f. City, State	50g. Year(s) of Treatment	50h. Was this covered by TRICARE
								Years I do not know/do not recall N/A	□ Yes □ No □ I do not know/do not recall □ N/A

IV. EXPOSURES

Resume universal questions	
	□ Residential (living on-base)
	□ Occupational (working on-base)
Please select all of the types of exposure you allege:	□ In utero
	\Box Other (e.g., visiting/recreation)

52.	Please select all of the areas on base in which Plaintiff lived.	 Tarawa Terrace (includes Tarawa Terrace I, Tarawa Terrace II, Camp Knox Trailer Park) Hadnot Point (includes Mainside barracks, French Creek, and Hospital Point) Montford Point (includes Camp Johnson) Holcomb Boulevard (includes Berkeley Manor, Midway Park, Paradise Point, Watkins Village) Courthouse Bay New River Air Station 			
		 (includes MCAS New River and Camp Geiger); Onslow Beach Rifle Range Other: I do not know/do not recall N/A 			
53.	Was the Plaintiff residing with a servicemember during the period of exposure (e.g., parent or spouse), including in utero exposures?	 ☐ Yes, residing with a servicemember parent ☐ Yes, residing with a servicemember spouse ☐ Yes, residing with someone else who was a servicemember ☐ No ☐ I do not know/do not recall 			
54.	If the Plaintiff was residing with a servicemember during the				
55.	period of exposure, please identify the servicemember: Servicemember First Name				
56.	Servicemember Middle Name				
57.	Servicemember Last Name				
58.	Servicemember SSN	[][][]-[][]-[][][][] □ I do not know/do not recall			
59.	Servicemember Date of Birth	MM/DD/YYYY			
60.	Servicemember Branch of Service	 Marine Corps Army Navy Air Force Coast Guard I do not know/do not recall 			

61.	Servicemember Service Number	 □ N/A (e.g., service after 1970) □ I do not know/do not recall
62.	Claimant relationship with Servicemember at the time of exposure.	 Child Spouse Mother Father Mother-in-law Mother-in-law Stepmother Stepfather Other: I do not know/do not recall
Co	nplete this section only if alleging in utero exposures:	🗆 Tarawa Terrace
63.	Please select all of the areas on base in which Plaintiff's mother lived when the Claimant was in utero:	 Tarawa Terrace (includes Tarawa Terrace I, Tarawa Terrace II, Camp Knox Trailer Park) Hadnot Point (includes Mainside barracks, French Creek, and Hospital Point) Montford Point (includes Camp Johnson) Holcomb Boulevard (includes Berkeley Manor, Midway Park, Paradise Point, Watkins Village) Courthouse Bay New River Air Station (includes MCAS New River and Camp Geiger) Onslow Beach Rifle Range Other: I do not know/do not recall N/A
64.	Did Plaintiff's mother work at Camp Lejeune as a federal civilian employee when the claimant was in utero?	 ☐ Yes ☐ No ☐ I do not know/do not recall
65.	If yes, what was the name of the government employer?	☐ I do not know/do not recall

V. PERSONAL HISTORY

Resume universal questions	
66 Was the Disintiff over everyaged to A cont	□ Yes
66. Was the Plaintiff ever exposed to Agent Orange?	□ No
Orange:	□ I do not know/do not recall

67.	Was the Plaintiff ever exposed to open air burn pits?	□ Yes □ No □ I do not know/do not recall
68.	Other than time spent residing at Camp Lejeune, was the Plaintiff ever employed in any of the following occupations? Check all that apply.	 Dry cleaning Firefighter Hairdresser/barber Metal degreasing Oil & gas Painter Road Construction Textile Manufacturing Welder None of the Above I do not know/do not recall

Add'l Personal History

	sal questions tify the highest a know/do not rec		claimant a	ttaineo	d or				
69a. Name of institution	69b. City, State	69c. Year attendance began	69d. Yea attendand ended				69. Field of study		69g. Degree awarded?
☐ I do not know/do not recall	□ I do not know/do not recall	YYYY □ I do not know/do not recall	YYYY □ I do n know/do recall		□ I do not know/do not recall		□ I do not know/do not recall		 ☐ Yes ☐ No ☐ I do not know/do not recall
70. Did the Pla license?	intiff ever posse	ss an occupation	al certifica	tion oi	ſ	□ Yes □ No □ I do	not know/	/do not	recall
71. [If yes] Wh Plaintiff po	at occupational ossess?	certifications or	licenses die	d the					
children of	tify all family g the Plaintiff wh identified on the	o have ever beer	n diagnosed	with a					
72a. Name	72b. Relationship	, 72c. Yea	r of birth	72d.	Cancer	or diseas	se	72e. diagn	Year of losis
☐ I do not know/do not recall	□ Grandparent □ Parent □ Sibling □ Children □ I do not cnow/do not □ I do not		□ K □ L □ N lymp □ P		ancer a	5e	YYY	Y do not know/do	

VI. ECONOMIC LOSS

Resume universal questions	
73. Are you seeking recovery for economic loss, such as out-of-pocket medical costs or lost earnings?	□ Yes □ No
Following questions available only if answer to Que	stion 73 = "Yes"
74. Has the Plaintiff ever paid or incurred any out- of-pocket medical expenses (i.e. expenses not paid by your insurance company or by a government health program) related to any condition caused by exposure to water at Camp Lejeune?	□ Yes □ No
75. Has the Plaintiff ever paid or incurred any out- of-pocket non-medical expenses (i.e. expenses not paid by your insurance company or by a government health program) related to any condition caused by exposure to water at Camp Lejeune?	□ Yes □ No
76. Has an injury related to Camp Lejeune water caused the Plaintiff to be unable to work?	□ Yes □ No

VII. PRIOR CLAIMS

Resume universal questions	
77. Did the Plaintiff (or someone else on the Claimant's behalf) ever	\Box Yes
file a civil litigation complaint against the United States related to	
contaminated water at Camp Lejeune before August 11, 2022?	\Box I do not know/do not recall
Following questions available only if answer to question 77 = "Yes"	·
78. What was the caption (the title or name) of the prior litigation?	
79. In what court was the prior litigation filed?	United States District Court for the District of
80. What was the case number?	
	\Box Yes
81. Was the case consolidated in a multi-district litigation?	□No
	\Box I do not know/do not recall
Back to universal questions	
	□Yes
82. Has the Plaintiff filed a bankruptcy petition since August 10,	□ Yes □ No
82. Has the Plaintiff filed a bankruptcy petition since August 10, 2022?	
	□ No
2022?	□ No
2022?	□ No
2022? Following questions available only if answer to question 82 = "Yes"	□ No □ I do not know/do not recall
2022? Following questions available only if answer to question 82 = "Yes"	□ No □ I do not know/do not recall MM/DD/YYYY
2022? Following questions available only if answer to question 82 = "Yes"	□ No □ I do not know/do not recall MM/DD/YYYY □ I do not know/do not recall

Add'l Prior claims

Back to universal qu	estions								
86. Has the Plaintiff	f ever fi	led a disability	claim with a	stata aganav		□ Yes			
for the injuries i						\Box No			
-					\Box I do not know/do not recall				
87. [If yes] Please describe the nature of the disability claim and any award:									
						87e. Amount			
87a. Name of 87b. Description		Description of	87c. Date cl	aim was		87d. Whether Plaintiff was		received in	
agency where claim was filed	claim	and disability	filed			warded disabi	litv	disability (or \$0 if	
								none awarded)	
					_				
			MM/DD/YY	YYY		☐ Yes			
						□ No □ I do not		\$	
			\Box I do not l	know/do		now/do not re	call		
			not recall		-		oun		
						□ Yes			
			MM/DD/YYYY			🗆 No		\$	
			\Box I do not know/do		Ľ	\Box I do not		Φ	
			not recall		k	know/do not recall			
			MM/DD/YYYY			\Box Yes			
					_	□ No		\$	
			\Box I do not know/do			□ I do not know/do not recall			
			not recall		K	liow/do liot le	can		
88. Did the Plaintiff	$\frac{1}{2}$	neone else on ti	ne claimant's	hehalf) ever		□ Yes			
file a civil litigat						□ No			
Orange?		1	1	e		🗆 I do not ki	now/do	o not recall	
89. [If yes] Please id	dentify:								
							804	Amount of	
		89b. Court wh	ere the					bensation received	
89a. Case caption		litigation was		89c. Case n				the lawsuit (or \$0 if	
								awarded)	
					Φ				
							\$		
90. Did the Plaintiff	(or so	neone else on th	ne claimant's	behalf) ever		□ Yes			
file a civil litigat						\Box No			
(Round-Up)?						🗌 I do not ki	now/do	o not recall	
91. [If yes] Please identify:									

91a. Case caption	91b. Court where the litigation was filed	91c. Case number	91d. Amount of compensation received from the lawsuit (or \$0 if none awarded)

VIII. ADDITIONAL NOTES AND COMMENTS

Question No.	Comment

PLAINTIFF CERTIFICATION OF DPPF

I, _____, certify that the information herein and/or

supporting the attached Discovery Pool Profile Form is true and accurate to the best of my

knowledge, information, and belief. I declare under penalty of perjury that the foregoing is true and correct.

[Plaintiff Name]

INSERTS FOR ADDITIONAL INJURIES

92. I am completing this section as it relates to:	□ Bladder cancer			
	□ Kidney cancer			
	🗆 Leukemia			
	Non-Hodgkin's lymphoma			
	Parkinson's disease			
	□ Adverse Birth Outcomes			
	\Box ALS			
	□ Aplastic anemia or myelodysplastic syndromes			
	\square Bile duct cancer			
	□ Brain/CNS cancer			
	□ Breast cancer			
	□ Cardiac birth defects			
	□ Cervical cancer			
	□ Colorectal cancer			
	□ Gallbladder cancer			
	Hepatic steatosis			
	☐ Hypersensitivity skin disorder			
	□ Infertility			
	□ Intestinal cancer			
	 Non-cancer kidney disease Leukemia 			
	□ Liver cancer			
	☐ Multiple myeloma			
	□ Neurobehavioral effects			
	□ Non-cardiac birth defects			
	Ovarian cancer			
	\square Pancreatic cancer			
	\Box Prostate cancer			
	\Box Sinus cancer			
	\Box Soft tissue cancer			
	Systemic sclerosis/scleroderma			
	□ Thyroid cancer			
	□ Other:			
Has a physician diagnosed the Plaintiff with this	□ Yes			
	□ No			
injury?	\Box I do not know/do not recall			
If yes, when was Plaintiff first diagnosed this	MM/DD/YYYY			
injury?	□ I do not know/do not recall			
	\Box N/A			

a) Injury [] – *repeat questions for each injury asserted (if needed)*

95. Name of physician that first diagnosed the Plaintiff?				[Name □ I do not know/do not recall □ N/A				
96.	96. Name of hospital or medical group of physician:				Name □ I do not know/do not recall □ N/A				
	97. Do you allege that this Injury caused or contributed to the Plaintiff's death?				 □ Yes □ No □ I do not know/do not recall □ N/A 				
98.	group, and cit	y, state where	name of medical e treatment was re: No treatment	nt.					
	50a. First name, if known	50b. Middle Initial, if known	50c. Last name, if known	50d. Suffix if known		50e. Medical Group	50f. City, State	50g. Year(s) of Treatment	50h. Was this covered by TRICARE
								Years I do not know/do not recall N/A	☐ Yes ☐ No ☐ I do not know/do not recall ☐ N/A