

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 )  
 )  
This Document Relates To: )  
ALL CASES )

**STIPULATION REGARDING PRODUCTION OF PLAINTIFFS’  
MEDICAL RECORDS AND SOCIAL SECURITY RECORDS**

Plaintiffs’ Leadership Group (“PLG”) and the Defendant United States of America (collectively, the “Parties”) jointly stipulate to the following in the above-captioned matter pursuant to Fed. R. Civ. P. 29:

1. In an effort to facilitate the efficient production of documents, the PLG is providing Defendant, on behalf of every Track 1 Discovery Pool Plaintiff, with a Health Insurance Portability and Accountability Act (HIPAA) compliant authorization form for the release of patient information from private third-party medical providers pursuant to 45 CFR § 164.508 (the “HIPAA form”). Defendant is using the HIPAA form to obtain private third-party medical records for discovery pool plaintiffs (the “Medical Records”). In addition, Defendant seeks for every Track 1 Discovery Pool Plaintiff a completed Social Security Administration SSA-7050-F4 form requesting and authorizing the release of social security earning information (“Social Security Records”). The Parties expect that a similar production of authorization forms will be consummated for future discovery tracks.

2. The Parties agree that the PLG would be entitled to receive copies of the Medical Records and Social Security Records in response to a production request pursuant to Fed. R. Civ. P. 34. Further, the Parties agree that it would not be efficient for the PLG to be required to serve further document production requests simply for purposes of obtaining the Medical Records and Social

Security Records.

3. Therefore, the Parties stipulate and agree that Defendant will produce all Medical Records and Social Security Records to the PLG in a timely manner upon receipt of the records for each respective discovery pool plaintiff.

4. Finally, the Parties agree that Defendant will contemporaneously copy the PLG on all subpoenas for medical records from private third-party medical providers, as well as all correspondence Defendant has with private third-party medical providers related to obtaining medical records. The Parties have agreed that e-mail notice twenty-four hours in advance of issuance of a document-only subpoena to a third-party is sufficient to meet the notice requirement of Fed. R. Civ. P. 45(a)(4).

Dated: April 19, 2024.

*[Remainder of page intentionally left blank]*

STIPULATED TO BY:

/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/ Zina Bash

Zina Bash (admitted *pro hac vice*)  
Keller Postman LLC  
111 Congress Avenue, Ste. 500  
Austin, TX 78701  
Telephone: 956-345-9462  
zina.bash@kellerpostman.com  
*Co-Lead Counsel for Plaintiffs  
and Government Liaison*

/s/ Robin 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/ Elizabeth Cabraser

Elizabeth Cabraser (admitted *pro hac vice*)  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
275 Battery Street, Suite 2900  
San Francisco, CA 94111  
Phone (415) 956-1000  
ecabraser@lchb.com  
*Co-Lead Counsel for Plaintiffs*

/s/ W. Michael Dowling

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

BRIAN M. BOYNTON

Principal Deputy Assistant Attorney General  
Civil Division

J. PATRICK GLYNN

Director, Torts Branch  
Environmental Torts Litigation Section

BRIDGET BAILEY LIPSCOMB

Assistant Director, Torts Branch  
Environmental Torts Litigation Section

/s/ Adam Bain

ADAM BAIN  
Special Litigation Counsel  
Environmental Torts Litigation Section  
U.S. Department of Justice  
P.O. Box 340, Ben Franklin Station  
Washington, D.C. 20044  
E-mail: adam.bain@usdoj.gov  
Telephone: (202) 616-4209

LACRESHA A. JOHNSON

HAROON ANWAR  
DANIEL C. EAGLES  
NATHAN J. BU  
Trial Attorneys, Torts Branch  
Environmental Torts Litigation Section  
*Counsel for Defendant United States of  
America*

mike@dowlingfirm.com  
*Co-Lead Counsel for Plaintiffs*

/s/ James A. Roberts, III  
James A. Roberts, III (N.C. Bar No.: 10495)  
Lewis & Roberts, PLLC  
3700 Glenwood Avenue, Suite 410  
P. O. Box 17529  
Raleigh, NC 27619-7529  
Telephone: (919) 981-0191  
Fax: (919) 981-0199  
jar@lewis-roberts.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, North Carolina 28144  
Tel: 704-633-5244  
*Co-Lead Counsel for Plaintiffs*