

CAMP LEJEUNE PLAINTIFFS' LEADERSHIP COUNSEL

REPORT ON THE STATUS OF THE CAMP LEJEUNE WATER LITIGATION AUGUST 11, 2025

Below is the August 11, 2025, report on the status of the Camp Lejeune Water Litigation from Plaintiffs' Leadership Counsel:

Dear Counsel and Pro Se Plaintiffs:

The Court conducted a status hearing on Friday, August 8, 2025, attended by Plaintiffs' Leadership Group ("PLG") and DOJ counsel. The Honorable Magistrate Judge Robert Jones presided. The Court heard updates from the parties regarding various matters, including:

1) Proposed Track 3 Diseases

- PLG reported that it has decided on four diseases and will have the fifth proposed Track 3 disease within the next couple of weeks. PLG reported that it wants all Track 3 diseases to reflect diseases with substantial scientific support for a causal connection between the contaminated water and each disease.*
- DOJ reported that it will not have any proposed changes to its original list of proposed Track 3 diseases.*

2) Discovery

- All Phase 3 specific causation expert depositions have been completed, with the exception of the supplemental deposition of Dr. Reynolds, which is scheduled for August 12.*
- The amended deadline for fact depositions related to the government's production of alleged offset related data is September 2. DOJ stated that it has produced all unfiltered data regarding alleged offsets from all government agencies with the exception of one agency, and that data will be transmitted to PLG soon.*
- The deadline for PLG to produce updated damage assessment forms for each Track 1 bellwether Plaintiff is October 13. The deadline for disclosure of PLG damages/offset experts is also on October 13.*

3) Track 2 Discovery

- The parties have met and conferred to work on a more efficient discovery schedule for Track 2 discovery. The parties feel that having gone through significant discovery for Track 1 plaintiffs, they now believe that they will be able to create a more efficient discovery schedule for the Track 2 discovery. They expect to submit a joint proposal for Track 2 discovery soon.*

4) Errata Sheet for Dr. Richard Hoppe

- DOJ sought permission to file a Motion to Strike with respect to the deposition errata sheet of PLG's non-Hodgkins Lymphoma specific causation expert, Dr. Richard Hoppe. Dr. Hoppe was deposed in June and completed an errata sheet in July. On the errata sheet Dr. Hoppe made 48 entries, many of which DOJ contends are inappropriate substantive changes. DOJ conferred with PLG in an attempt to try to resolve the issue and PLG offered for DOJ to depose Dr. Hoppe about the errata sheet, but that was not satisfactory to DOJ. PLG reported that it disagrees with the DOJ's argument regarding the nature of the errata corrections and that it is premature for DOJ to file a motion since PLG had offered DOJ the opportunity to conduct a supplemental deposition of Dr. Hoppe, to address Dr. Hoppe's entries on the errata sheet. PLG argued that reopening Dr. Hoppe's deposition to allow the DOJ to ask Dr. Hoppe about the errata changes would likely eliminate a significant portion, if not all, of the dispute and also serve to better inform the Court as to why the changes were made if the DOJ still feels a motion is appropriate. Accordingly, reopening Dr. Hoppe's deposition to allow questioning about the errata is the most expedient way to address this issue at the present time.*
- DOJ argued that striking the relevant portions of the errata sheet is the appropriate remedy.*
- Judge Jones requested that the parties work to schedule a supplemental deposition for Dr. Hoppe for up to 3½ hours to allow DOJ to question Dr. Hoppe about the entries/changes on the errata sheet. Thereafter, if there remains a problem or an unresolved issue, DOJ can then address the Court with respect to its Motion to Strike.*

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4) **Goldman – Parkinson's Expert**

- DOJ reported that it is working with PLG and a third-party to resolve an issue regarding a subpoena DOJ is seeking to issue to the third-party. Experts for DOJ and PLG have cited Dr. Samuel Goldman and his work, and some of PLG's experts have stated in their depositions that they have had communications with Dr. Goldman. DOJ was seeking to serve an extensive subpoena on Dr. Goldman and objections were raised. DOJ has recently discussed with Dr. Goldman's counsel the possibility of serving Dr. Goldman with a more narrowly drawn subpoena to obtain information regarding the communications Dr. Goldman had with PLG's experts. PLG objected to the subpoena DOJ initially sought to serve on Dr. Goldman on the basis that fact discovery is over and the subpoena constituted an impermissible fishing expedition. DOJ and PLG are working together to see if an agreement can be reached now that a more narrow subpoena has been proposed. A meet and confer about the new subpoena is scheduled for Monday.

The transcript of the August 8, 2025 hearing will be posted by Plaintiffs' Leadership Group on its website upon receipt of same. The next status conference with the Honorable Magistrate Judge Robert Jones will be held on Tuesday, August 26, 2025 at 11:00 a.m. in Wilmington.

Please continue to monitor our website for real-time updates: <https://camplejeunecourtinfo.com/>.

Respectfully,

Plaintiffs' Leadership Group

We are committed to supporting you throughout the Camp Lejeune litigation process. Our involvement spans all levels, from investigating and preparing administrative claims to filing suits and managing settlements. Contact us today!