

CAMP LEJEUNE PLAINTIFFS' LEADERSHIP COUNSEL

REPORT ON THE STATUS OF THE CAMP LEJEUNE WATER LITIGATION SEPTEMBER 3, 2025

Below is the September 3, 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 29, 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) Update on DOJ's Provision of Offset Data

- *On August 25, 2025, PLG received the last offset production from DOJ regarding CMS-Medicare data. PLG has taken three depositions of agency representatives, another deposition was being taken at the same time as the status hearing, and three more are scheduled to be completed by September 9th. DOJ's provision of offset data and the related depositions are a week behind schedule. PLG is not sure yet whether it will be requesting additional time to complete damage assessment forms and expert reports on damages, which are due on October 13, 2025.*

2) DOJ Subpoena Issued to Dr. Goldman

- *The parties report that the dispute regarding DOJ's subpoena to Dr. Goldman has been resolved, resulting in the issuance of an agreed-upon modified subpoena and agreement from the DOJ that no more subpoenas will be issued.*

3) Update regarding PLG's Amended Proposed Track 3 Diseases

- *PLG recently submitted its proposed amended Track 3 diseases.*

4) Update on Joint Proposal for Track 2 Discovery

- *The parties indicate that there has been some progress made with the recent mediations and with the issues relating to water modeling and general causation ripe for disposition by the Court, the parties are hopeful that once those rulings are made a global resolution might be achieved. Given the expenditure of resources associated with moving forward with Track 2 discovery, the PLG suggests not rushing into Track 2 discovery at this time.*

5) Status of Finalization of Supplementation of Expert Opinions

- *DOJ seeks to explore a deadline for supplementation of expert opinions but will bring the issue to the Court's attention at a future point in time. Right now, the threshold issues of water contamination and general causation are ripe for determination and it will be helpful to the parties for those issues to be decided. The parties also are working on Daubert motions and supporting briefs.*
- *The PLG noted that given that the trials of these cases will be bench trials, it would seem to be a better use of judicial resources to simply address any expert issues at trial.*

6) Applicability of Court's Recent Order Regarding Use of General Causation Opinions by PLG Specific Causation Experts

- *PLG requested the Court to enter an order indicating that its recent Order regarding specific causation expert's reliance on general causation expert opinions [DE 444] be applied to all experts. DOJ indicated its position is that the Court's Order applies only to those experts included in the motion that the Order addresses.*
- *The Court indicated to PLG that it should file its motion.*

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The transcript of the August 29, 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 Monday, September 15, 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!