

CAMP LEJEUNE PLAINTIFFS' LEADERSHIP COUNSEL

REPORT ON THE STATUS OF THE CAMP LEJEUNE WATER LITIGATION NOVEMBER 17, 2025

Below is the November 17, 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, November 14, 2025, attended by Plaintiffs' Leadership Group ("PLG") and DOJ counsel. The Honorable Magistrate Judge Robert Jones presided. The Court made inquiries of the parties and heard updates from the parties including the following:

1) Muster Rolls

- PLG requested that the government provide muster rolls for Camp Lejeune soon after the litigation began. DOJ indicated that the muster rolls were being digitized, and upon completion the digitized muster rolls would be provided to PLG. DOJ previously indicated that the process should be completed by this past summer.*
- PLG made the Court aware that DOJ has provided digitized muster rolls for only two of the relevant 32-year period, and that PLG needs the muster rolls for the remaining 30 years. PLG needs the muster rolls in order to more expediently ascertain where the claimants resided while at Camp Lejeune and the period of time during which they resided there.*
- PLG has reached out several times to DOJ requesting this information and were only recently advised by DOJ that the current digitization project includes muster rolls and individual service records service-wide – not just specific to Camp Lejeune. DOJ has further indicated that for this reason, in order to complete the digitization process, and produce the data relevant to Camp Lejeune claimants, it would cost over \$1 million. DOJ further indicated that it would not be able to provide this information before 2026, and would require PLG to pay its cost.*
- PLG responded that DOJ's current position is inconsistent with its prior position, noting that DOJ stated at least twice last year that the information would be produced. Further, PLG has been relying on DOJ's previous representations. PLG indicated that the burden to produce this information should be on DOJ, and the costs should not be transferred to the claimants.*
- The Court encouraged the parties to try to work the issue out and indicated that if the matter could not be resolved, PLG may move forward with filing a Motion to Compel.*

2) PLG's Motion to Reserve Admissibility Determinations and Expedite Track 1 Bellwether Trials [D.E. 721]

- PLG made the Court aware that PLG recently filed the above motion, with substantial authority supporting same. In an effort to expedite Bellwether trials and maximize efficiency, PLG is requesting that rather than have all judges review all memoranda relating to each Daubert motion (consisting of thousands of pages of argument), the specific trial judge for each Bellwether disease undertake the Daubert motions relative to that disease. Because the Bellwether trials are bench trials and not jury trials, there is no need for all four judges to be required to read all memoranda related to each Daubert motion. There also is no need for the judges to rule on each Daubert motion in advance of the trials since the Court is both factfinder and gatekeeper in a bench trial. In its motion, PLG also is requesting that the Court schedule one disease group for trial as soon as possible, and that the trial judge then hear all expert testimony and make admissibility determinations at trial. This is an expedient way to reach trial and resolutions as quickly as possible.*
- DOJ opposes the motion and indicates that it will be filing a response to the motion. The Court indicated that after DOJ files its response to the motion, the Court will rule on the motion.*

3) Discovery-Trial Process for Track 2 Plaintiffs

The water modeling issue is currently pending before the Court. Judge Jones asked if the water modeling issue would need to be decided before the individual trials take place. While a ruling on the water modeling issue would be helpful, trials could move forward without a prior ruling on the water modeling issue. The ATSDR water model is the basis for the Camp Lejeune Justice Act. It is the most comprehensive water study ever conducted.

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- *It was conducted over several years prior to the enactment of the Camp Lejeune Justice Act, and not for litigation. It is the government's own study. PLG advocates that, for these reasons, the ATSDR water model is inherently reliable and clearly admissible. Individual trial judges can review the ATSDR water model as it relates to the specific disease at issue, and make determinations as to each claimant's exposure.*
- *DOJ argued that the water modeling issue should be determined first by the full Court because it contends there are reliability issues with the ATSDR water model with respect to the exposure for Camp Lejeune claimants. DOJ contends that the reliability issues should be determined by the full court. DOJ further requests that an evidentiary hearing be conducted regarding the level of contaminants at Camp Lejeune.*
- *In response, PLG indicated that the Court only needs to determine if the ATSDR study was properly conducted and admissible, and all information regarding the contaminants, the level of those contaminants and the location of those contaminants for the period in question can be ascertained by the ATSDR model. This can be evaluated by individual trial judges at trial. PLG indicates that the water model issue has been thoroughly briefed and is ripe for ruling, and therefore there is no need for an evidentiary hearing.*
- *PLG indicates that all of the DOJ's concerns and the testimony of DOJ's experts with respect to water modeling can be admitted during the trial and the trial judge can then make determinations regarding the reliability of the water model, and exposure levels and duration of time for each Bellwether plaintiff.*

4) Deadline for Expert Supplementation for Track 1

- *In the joint status report [D.E. 662] filed last week, DOJ indicates that it plans to raise, and is willing to work with PLG on a proposal to establish a final deadline for expert report supplementation. DOJ seeks to create a firm supplementation deadline for expert opinions.*
- *PLG opposes the request for expert supplementation. PLG indicates that DOJ is requesting this opportunity to provide expert report supplementations because its experts prepared poor reports. One of DOJ's experts, Julie Goodman, after PLG filed its Daubert motion seeking to exclude Goodman's testimony, made substantial changes (approximately 290) to her report, for the most part claiming that these were typographical errors. PLG indicates that most of the changes are substantive, and that the supplementation by Goodman was prepared to address the numerous issues raised by PLG in its Daubert motion. PLG indicates that this is inappropriate and PLG will be filing a Motion to Strike Julie Goodman's supplementation to her report. The PLG also foresees other problems if DOJ is allowed to substantively supplement all of its expert reports at this point in the litigation.*
- *The Court indicated that it will address PLG's motion when filed.*

5) PLG Request for Plaintiff Payment Information

- *PLG has requested that DOJ produce payment information for claimants, including policy premiums, co-pays, deductibles, and co-insurance payments or any other expenses not covered that were billed to plaintiffs. DOJ argues that this information is outside the scope and purpose of additional damages discovery, but has agreed to work with relevant federal agencies to determine if they have custody or control over the requested information.*
- *DOJ indicates that it has reached out to TRICARE, the Department of Veterans Affairs, and CMS (Center for Medicare and Medicaid Services). DOJ indicates that it is waiting for responses from TRICARE and CMS. The Department of Veteran Affairs has indicated that it will take approximately 10-12 hours to research each veteran's account to determine this information.*
- *The parties are continuing to discuss a resolution and if unsuccessful, PLG will file a Motion to Compel.*

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6) Update Regarding the Court's Order [D.E. 91]

- *On December 21, 2023, the Court entered an Order requiring that each Plaintiff who files a Short Form Complaint must provide Defendant with the claimant's date of birth and social security number. [D.E. 91] DOJ indicates that the information required per the Court's Order has been submitted by numerous claimants, but there are approximately 700 submissions with missing information. DOJ indicates that it is working with PLG to ensure that the complete information is submitted and included in Rubris.*

The transcript of the November 14, 2025, hearing will be posted by Plaintiffs' Leadership Group on its website upon receipt of the same. The next status conference with the Honorable Magistrate Judge Robert Jones will be held on Wednesday, December 3, 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!