

Case 7:23-cv-00897-RJ Document 406 Filed 06/16/25 Page 1 of 5

DATED this 16th day of June, 2025.

Respectfully submitted,

Thomas J. Perrelli

Thomas J. Perrelli
Jenner & Block, LLP
1099 New York Ave NW
Suite #900
Washington, DC 20001
Telephone: (202) 639-6004
tperrelli@jenner.com

Christopher G. Oprison

Christopher G. Oprison
DLA Piper LLP (US)
500 8th Street, N.W.
Washington, D.C. 20004
Telephone: (305) 423-8522
chris.oprison@dlapiper.com

Settlement Masters

EXHIBIT A

REPORTING MEMORANDUM

TO: The Court
FR: CLJA Settlement Masters
CC: Plaintiffs' Leadership Group
U.S. Department of Justice
DATE: June 16, 2025
RE: Settlement Master June 2025 Update: *In Re Camp Lejeune Water Litigation*,
Case No. 7:23-cv-897

I. INTRODUCTION

- On March 21, 2025, the Court-appointed joint Settlement Masters Thomas J. Perrelli of Jenner & Block, LLP and Christopher G. Oprison of DLA Piper LLP (US) (together, “SMs”) filed a status report regarding the settlement process to date. This subsequent report is intended to address the efforts undertaken since that time by the SMs and the parties, the Department of Justice (“DOJ”) and the Plaintiffs’ Leadership Group (“PLG”) (collectively the “Parties”).
- The SMs continue to work diligently with the Parties to resolve as many claims as possible outside of traditional adjudication. In pursuit of this goal, the Parties have agreed to utilize a questionnaire and bellwether mediation, *inter alia*, to inform the development of a settlement matrix that may be applied to resolve a number of qualifying claims.

II. STATUS OF DISCUSSIONS WITH PARTIES

- The SMs continue to meet with the Court’s Settlement Liaison, the Hon. James Gates, on a weekly basis.
- The SMs have also been in regular communication with the Parties, both via email and teleconference. The SMs met with the DOJ on April 17 and 25, 2025 and with both Parties on May 2 and 9, 2025.
- In addition to working with the SMs towards the collective goal of settlement, and at the urging and encouragement of the SMs, the Parties have been in direct communication with each other to finalize the substance of and process related to the questionnaire as well as the details of the upcoming mediations.

III. SETTLEMENT STRATEGY DEVELOPMENT

- As described in the March 21, 2025 Status Report, the SMs continue to work with the Parties to (i) develop and disseminate a questionnaire, (ii) mediate a subset of pending claims, and (iii) seek resolution of discrete legal issues, as needed, to inform the development of a matrix.

- The Parties have agreed upon the process for extracting a random (and representative) sample of claimants who will receive the questionnaire. The Parties have also agreed on the universe of injuries/conditions that will be the focus of the questionnaire and that the responses from the sample of claimants for the questionnaire will serve as a basis to negotiate a global resolution. The Parties are finalizing the identification of the questionnaire respondents.
- The Parties have agreed to mediate all twenty-five (25) of the pending Track 1 bellwether cases. Judge Gates and the SMs will serve as the mediators. The Track 1 bellwether cases share common injuries/conditions and, for purposes of facilitating an efficient mediation process, will be grouped into six (6) categories and mediated together, specifically:
 1. Acute Leukemia;
 2. Chronic Leukemia;
 3. Bladder Cancer;
 4. Kidney Cancer;
 5. Non-Hodgkin's Lymphoma; and
 6. Parkinson's Disease.
- Each mediation will be led by one of the three mediators and supported by one of the remaining two.
- Subject to finalizing scheduling, the intent is for the mediations to begin in late July and conclude by late August. The SMs and Judge Gates will provide the Court with the specific dates for each grouping once they are finalized.
- The negotiations for the settlement matrix will begin after the mediations and questionnaire processes have concluded.

IV. CONCLUSION

- The SMs and Parties continue to work toward finalizing a matrix and global settlement framework for resolving a significant portion of the present claims by the end of 2025. The SMs commend the Parties on their continued commitment to working expeditiously to achieve this goal.

###