

REPORTING MEMORANDUM

October 8, 2025

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

I. INTRODUCTION

- On March 21, 2025, and June 16, 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 status reports regarding the settlement process to date. These reports addressed efforts undertaken by the SMs and the parties, the Department of Justice ("DOJ") and the Plaintiffs' Leadership Group ("PLG") (collectively the "Parties") to resolve matters before the Court and in the Navy's administrative forum.

II. STATUS OF DISCUSSIONS WITH PARTIES

- As described in prior reports, the Parties have been pursuing a three-step path, under the direction of the SMs, to a broad settlement:
 - Bellwether mediations* that would help the Parties to value specific types of cases and to identify the variables that might impact settlement values in any matrix that they would develop.
 - A questionnaire process* that would provide detailed information about a sample of cases that the Parties could extrapolate to the population as a whole (more than 400,000 claims including the administrative process).
 - Development of a global settlement framework*, including negotiation of the financial terms of a settlement, as well as other necessary terms.
- Since the June 16 report, the SMs and Magistrate Judge Gates, as Settlement Liaison, completed the bellwether mediation process, which required the Parties to negotiate and attempt to resolve the 25 bellwether cases. Although the Parties reached resolution on only three of the cases, the Parties and the SMs gained important information on how the Parties evaluated the cases that may ultimately facilitate development of a settlement matrix, including relevant factors for such a matrix. The SMs intend to continue to work with the Parties to resolve additional bellwether cases.

- On September 24, 2025, the Parties and the SMs finalized the questionnaire, which had been subject to negotiations between the DOJ and representatives of plaintiffs since February 2023, and launched the questionnaire process on the PLG-controlled Rubris database. Pursuant to that process, a random sample of approximately 2,500 claimants has been asked to complete a detailed questionnaire that will provide additional information about the characteristics of the entire claimant population. Claimants will have 60 days to complete the questionnaire.
- While the questionnaire process is proceeding, the SMs will continue to work with the Parties to negotiate provisions that will be necessary for a broad settlement of claims. The SMs met separately with each of the parties on October 3rd to discuss next steps and are scheduling a series of meetings throughout October and November.
- The goal of the settlement process remains to work toward agreement on a global settlement framework addressing a significant portion of the claims by the end of 2025.

III. UPCOMING SETTLEMENT ACTIVITY

- The SMs continue to meet with Judge Gates on a weekly basis.
- The SMs have requested weekly or biweekly reporting on the status of the questionnaire process to ensure that issues are quickly addressed. The SMs will provide this information to Judge Gates upon receipt. The SMs have made clear that claimants must not face unreasonable obstacles in utilizing the questionnaire database or obtaining documents relevant to the questionnaire from government agencies. The DOJ has provided instructions for the claimants to obtain their relevant documents from government agencies. The DOJ continues to be willing to follow up with agencies to help facilitate the process if the claimants encounter significant obstacles.
- The Parties will meet with the SMs multiple times in October and November to continue to advance settlement efforts.

###