

REPORTING MEMORANDUM

TO: The Court
FR: CLJA Settlement Masters
CC: Plaintiffs' Leadership Group
U.S. Department of Justice
DATE: February 5, 2026
RE: Settlement Master February 2026 Update: *In Re Camp Lejeune Water Litigation*,
Case No. 7:23-cv-897

I. INTRODUCTION

- On March 21, 2025, June 16, 2025, and October 8, 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 addresses the efforts taken by the SMs and the parties, the Department of Justice ("DOJ") and the Plaintiffs' Leadership Group ("PLG") (collectively the "Parties"), in the interim.

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 continued their efforts to reach resolution on a settlement framework with the Parties, including through regular email, telephonic, and videoconference meetings. Most recently, the SMs held a joint, in-person mediation session with the PLG and DOJ in Washington, DC on December 17, 2025; and again with the DOJ in Washington, DC on January 20, 2026. There have been other informal remote meetings with both Parties during this time period.

III. SETTLEMENT STRATEGY DEVELOPMENT

- As set forth in prior reports to the Court, the Parties have focused on three workstreams to develop a broad settlement of Camp LeJeune claims: 1) bellwether mediation of cases; 2) a questionnaire completed by a sample of the filed and administrative cases; and 3) development of a settlement framework.
- The bellwether mediation process was completed with limited success in the summer of 2025.
- The questionnaire process commenced in September 2025, with a deadline to respond to the questionnaire of November 24, 2025. There has been a substantial response rate, although some questionnaires remain incomplete. The SMs anticipate closing the questionnaire process in February. In parallel, the Parties and the SMs have been in discussions with respect to the overall settlement framework; the SMs hope that they will

be able to complete those discussions in the next several weeks. Finally, the SMs are working with the Parties to develop a settlement matrix, leveraging the learnings from the six prior mediations and questionnaire responses received to date.

IV. CONCLUSION

- The SMs and the Parties continue to work towards finalizing a global settlement framework. And the SMs commend the Parties on their continued commitment to working expeditiously to achieve this goal.

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