

Exhibit 2

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
No. 7:23-CV-897

IN RE:)
)
CAMP LEJEUNE WATER LITIGATION)
)
This Document Relates to:)
ALL CASES)
)

PLAINTIFFS' SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS
AND SECOND REQUEST FOR ADMISSION FOR TRACK ONE
DISCOVERY PLAINTIFFS

Plaintiffs respectfully serve this Sixth Request for Production of Documents, and Second Request for Admission for Track One Plaintiffs, as permitted under Federal Rules of Civil Procedure 26, 34 and 36 as well as Case Management Order No. 2 in the above-captioned matter. These requests are being served by Plaintiffs, through Lead and Co-Lead Counsel, on Defendant United States of America (“Defendant”). Defendant is requested to respond to these requests within thirty days of email delivery service and gather the information and documents from any and all relevant governmental agencies, military branches, employees whether retired or current employees. Unless otherwise stated, Plaintiffs incorporate the Instructions and Definitions in Plaintiffs’ First Request for Production of Documents.

I. REQUESTS FOR PRODUCTION

1. For each person below, please produce all documents, files and materials (not previously produced) including any hard copy documents, as well as saved computer native documents, data and files, related to any of the following individuals personal hard-copies or computer files maintained on either a shared network or a non-shared computer (laptop or desktop, office or home computer) which was not previously swept/searched/captured and produced in this litigation, related to any issue concerning contamination of water at Camp Lejeune and dated between January 1, 2008 and the present:

Frank Bove
Morris Maslia
Mark Johnson
Christopher Reh
Angela Ragin-Wilson
Jason Sautner
Dan Waddill
Terry Walters
Patricia Hastings
Scott Williams

RESPONSE:

2. Please produce all documents, files and materials (not previously produced) including saved computer native files, related to all software versions and associated data for the MARINE CORPS INSTALLATIONS EAST-MARINE CORPS BASE CAMP LEJEUNE ORDER 11100.5X (MCIEAST-MCB CAMLEJO 11100.5X) where “X” represents the version. According to the order “This Order establishes geographic areas aboard MCB CAMLEJ, identifies an Area Commander for each, describes the functions, responsibilities, and

authorities of each.” If there are similar base Orders published prior to Order 11100.5 that provide the same information as Order 11100.5 but have a different Order # then include them in the response.

RESPONSE:

3. Please produce all documents, files and materials (not previously produced) including saved computer native files, related to the database, including its data and the software program known as “MCB Camp Lejeune BPL” and/or entitled “BLPMAN.DBF” which contains approximately 6,439 records and relates to Camp Lejeune building a facilities among other referenced uses and data.

RESPONSE:

4. Please produce all documents, files and materials (not previously produced and saved computer native documents, data and files) including but not limited to any and all documents, spreadsheets, lists, database information and any other material that lists all Reporting Unit Codes (RUCs) or Unit ID Codes (UID) and the associated name of the unit for each and every year for the period of 1945 to 1987 for Camp Lejeune. If not available for every year from 1945 to 1987 provide for all years available and whenever there was a change to the RUC and/or UIC listing.

RESPONSE:

5. Please produce all documents, files and materials (not previously produced and saved computer native documents, data and files) related to any documents, spreadsheets, lists, database information and any other material, related to Camp Lejeune building numbers and

corresponding unit, organization, service or entity assigned to the building for the period of 1945 to 2000.

RESPONSE:

6. Please produce all documents, files and materials (not previously produced and saved computer native documents, data and files) related to the document "Plant Account Facilities Inventory Listing of Buildings & Structures". See "Plant Account Facilities Inventory Listing of Buildings & Structures 30 June 1990.pdf" for an example of what the request is asking for. If there are similar documents that provide the same information, "Facilities Inventory Listing of Buildings & Structures" then include them in the response.

RESPONSE:

7. Please produce all Camp Lejeune Telephone Directories from 1953 to 1987.

RESPONSE:

8. Please provide all maps from 1953 to 1987 that include building numbers and/or addresses for the following areas:

- i. Hadnot Point
- ii. Holcomb Blvd
 - 1. Berkeley Manor
 - 2. Midway Park
 - 3. Paradise Point
 - 4. Watkins Village
- iii. French Creek
- iv. Tarawa Terrace
- v. Know Trailer Park
- vi. Camp Geiger

- vii. Camp Johnson
- viii. Courthouse Bay
- ix. Rifle Range

RESPONSE:

9. Please produce all documents, spreadsheets, invoices, contracts, communications and computer files (not previously produced and saved computer native documents, data and files) related to all activities and costs associated with the Project NAVY CLEAN.

RESPONSE:

10. Please produce all documents, spreadsheets, invoices, contracts, communications, and computer files (not previously produced and saved computer native documents, data and files) whether on individual NAVY or MARINE shared files or personal computers related to all costs associated with the MUSTER ROLL Digitization Project contracted to CH2M Hill and its subcontractors Mountain States Imaging and/or the Scanning Company, as conducted as part of the NAVY CLEAN and Contract No. N62470-11-D-8012 CTO 0003, “Community Involvement/Risk Communication Plan Development and Support, MCB Camp LeJeune”.

RESPONSE:

11. Please produce all documents, spreadsheets, invoices, contracts, communications, and computer files (not previously produced and saved computer native documents, data and files) whether on individual ATSDR employee or network shared files or computers,

related to costs and expenses paid by the NAVY to ATSDR for its work, research and studies from January 2000, to the present concerning Camp Lejeune.

RESPONSE:

12. Please produce any documents or information reflecting the presence of any or all of the Track One Plaintiffs on the Camp Lejeune base for not less than 30 days during the period beginning on August 1, 1953, and ending on December 31, 1987.

RESPONSE:

13. Please produce all documents or information reflecting the identification of any and all Marines serving and having the same Reporting Unit Codes (RUCs) or Unit ID Codes (UID) as any of the Track One Plaintiffs during their time on board Camp Lejeune, including information and documents showing the unit description, unit number, the names of individuals who served in same unit as any of the Track One Plaintiffs at any time they were stationed at Camp Lejeune during the relevant period of this litigation.

RESPONSE:

14. Please produce all documents or information related to any of the Track One Plaintiffs contained within the database known as the DMDC [see information on DMDC at <https://dwp.dmdc.osd.mil/dwp/app/main>] including all archival information.

RESPONSE:

15. Please produce all documents or information related to any of the Track One Plaintiffs contained within the U.S. National Archives and Records Administration (NARA) records including all archival information, not previously produced.

RESPONSE:

16. Please produce all muster roll and service records whether in hard copy, electronic or in a database pertaining to any of the Track One Plaintiffs, not previously produced.

RESPONSE:

II. REQUESTS FOR ADMISSION

1. Admit that all Track One Plaintiffs were on the Camp Lejeune base in compliance with the statute for not less than 30 days during the period beginning on August 1, 1953, and ending on December 31, 1987.

RESPONSE:

2. Admit that Defendant has no information to refute the claim that all Track One Plaintiffs were on the Camp Lejeune base in compliance with the statute for not less than 30 days during the period beginning on August 1, 1953, and ending on December 31, 1987.

RESPONSE:

3. Admit that Defendant had a responsibility to generate and maintain military service and personnel records reflecting the identities of Track One Plaintiff Marines, their time periods in the service, their units and stations to which they were assigned, and reflecting their assignment to units at Camp Lejeune including between August 1, 1953 and December 31, 1987.

RESPONSE:

Respectfully submitted this 24th day of May 2024.

(Signatures follow next page.)

/s/ J. Edward Bell, III

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served upon counsel for Defendant on the 24th day of May 2024, by electronic mail at the following electronic mail address: adam.bain@usdoj.gov.

/s/ *J. Edward Bell, III*
J. Edward Bell, III
Lead Counsel for Plaintiffs