## 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	)
	)

## **DECLARATION OF SARA J. MIRSKY**

I, Sara J. Mirsky, declare pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct under penalty of perjury:

- I am a Trial Attorney for the United States Department of Justice. I have entered an
  appearance in this case. The facts set forth in this declaration are within my personal
  knowledge or based on documents and information that I have received in the course of
  litigating this case.
- 2. Prior to December 5, 2023, Plaintiffs' Leadership Group produced 459 Plaintiffs' dates of birth and/or social security numbers for the 1,444 potential Plaintiffs in this action, or approximately 32%.
- 3. Of the 471 Plaintiffs who filed Short Form Complaints, Plaintiffs' Leadership Group produced 58 Plaintiffs' dates of birth and/or social security numbers prior to December 5, 2023, or approximately 12%.

- 4. Of the 325 Plaintiffs who potentially qualify as Track 1 Discovery Plaintiffs, Plaintiffs' Leadership Group produced 35 Plaintiffs' dates of birth and/or social security numbers prior to December 5, 2023, or approximately 11%.
- 5. The United States has not received any additional dates of birth or social security numbers since December 5, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: December 12, 2022

## /s/ Sara J. Mirsky

SARA J. MIRSKY
New York Bar No. 5147590
Trial Attorney, Torts Branch
Environmental Tort Litigation Section
United States Department of Justice
P.O. Box 340, Ben Franklin Station
Washington, D.C. 20044
E-mail: sara.j.mirsky@usdoj.gov

Telephone: (202) 616-8362

Fax: (202) 616-4473

Attorney inquiries to DOJ regarding CLJA: (202) 353-4426