

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

**IN RE: AQUEOUS FILM-FORMING  
FOAMS PRODUCTS LIABILITY  
LITIGATION**

**MDL No. 2:18-mn-2873-RMG**

This Order relates to All Actions

**PLAINTIFF EXECUTIVE COMMITTEE’S RESPONSE TO  
CASE MANAGEMENT ORDER NO. 28**

Pursuant to Case Management Order (“CMO”) No. 28 [ECF 4681] the Court directed that the “Plaintiffs shall identify the diseases not addressed in CMO 26 that they assert are associated with exposure to an AFFF source in drinking water.” *See* CMO 28 at paragraph 1.

Accordingly, in response to CMO 28, the following diseases are identified:

- Liver cancer
- Thyroid cancer

Plaintiffs are not waiving any rights related to any injuries by not including them on the list of injuries above. *See* CMO 28 at paragraph 1. The parties are prepared to comply with all other aspects and timing provisions in CMO 28.

Dated: March 13, 2024

Respectfully submitted,

/s/ Michael A. London

Michael A. London  
Douglas and London PC  
59 Maiden Lane  
6th Floor  
New York, NY 10038  
P: (212)-566-7500  
mlondon@douglasandlondon.com

Paul J. Napoli  
Napoli Shkolnik PLLC  
1301 Avenue of The Americas  
10th Floor  
New York, NY 10019  
P: (212)-397-1000  
pnapoli@napolilaw.com

Scott Summy  
Baron & Budd, P.C.  
3102 Oak Lawn Avenue  
Suite 1100  
Dallas, TX 75219  
P: (214)-521-3605  
ssummy@baronbudd.com

Joseph Rice  
Motley Rice LLC  
28 Bridgeside Blvd.,  
Mt. Pleasant, SC 29464  
P: (843)-216-9000  
jrice@motleyrice.com

*Plaintiffs' Co-Lead Counsel*

-and-

Fred Thompson, III  
Motley Rice LLC  
28 Bridgeside Boulevard  
Mt. Pleasant, SC 29464  
P: (843) 216-9000  
fthompson@motleyrice.com

*Plaintiffs' Liaison Counsel*