Hon. Leevin Taitano Camacho Attorney General of Guam

December 20, 2019

Status report re: litigation pursuant to the Protehi I Hanom Act of 2019 PFAS Litigation Superior Court CV1080-19, District Court 19-CV-00144, Multi-District Litigation #2873

I. The PFAS Litigation has moved to the Multidistrict Litigation court in the District Court of South Carolina.

The Office of the Attorney General filed its Complaint (CV7080-19) in the Superior Court of Guam against The 3M Company, Tyco Fire Products LP, Chemguard Inc., Buckeye Fire Equipment Company, Kidde-Fenwal Inc., National Foam Inc., E.I. Du Point De Nemours and Co., and The Chemours Company. On November 4, 2019, the defendants filed a Notice of Removal with the Superior Court, starting the process of transferring the case to the United States District Court in South Carolina, which is handling the Multidistrict Litigation (MDL) for cases involving the use of aqueous film-forming foams (AFFFs). The purpose of the MDL is to have a single court handle the pretrial and discovery phases of cases from across the country. Guam's case was formally moved to the MDL on November 15, 2019.

II. Guam was represented at the MDL hearing where parties from both sides of the AFFF litigation presented information regarding the science relating to their claims and defenses.

Judge Gergel, who is presiding over the MDL, held a hearing on October 4, 2019, where he heard from experts called by both sides. The court asked the experts questions involving a wide range of topics such as adverse health effects of PFOS and PFOA and the scope of contamination throughout the United States.

III. The parties will exchange information relevant to Guam's claims.

The case is currently in the discovery phase, which means the parties are exchanging documents and information relevant to their claims.

/s/

LEEVIN TAITANO CAMACHO