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

IN RE:	)
CAMP I FIFTINE WATER LITICATION	) UNOPPOSED MOTION FOR EXTENSION
CAMI LEGEONE WATER EITIGATION	) OF PENDING DISCOVERY DEADLINES IN
	) INDIVIDUAL CASES
	) )
	)

Counsel for the Defendant United States of America respectfully moves for an extension of pending discovery deadlines in individual cases in which the United States has filed Answers up to and through October 2, 2023. Defendant's Motion is unopposed by Plaintiffs Lead Counsel J. Edward Bell III and Plaintiffs' Co-Lead Counsel & Government Liaison Zina Bash.

Plaintiffs' Lead Counsel, other members of Plaintiffs Leadership Group, and Counsel for the Defendant (the "Parties") met, both in person and virtually, numerous times to discuss a proposed case management plan. On August 28, 2023, the Parties filed their Proposed Case Management Order. DE 17.

Following the Parties' submission of the Proposed Case Management Order (DE 17), this Court granted extensions to plead or otherwise answer in response to the plaintiff's complaint in individual cases until October 2, 2023. *See e.g.* Order, *Anglin v. United States*, No. 7:23-cv-01187-BO-BM (E.D.N.C. August 31, 2023) ("In keeping with the scope and tenor of the Master Docket Orders (7:23-cv-897), the court ORDERS an extension of time for the Defendant to answer or otherwise plead in response to Plaintiff's complaint in all CLJA cases assigned to me through and including October 2, 2023. Signed by District Judge Terrence W. Boyle on

8/31/2023."). The Court's orders did not explicitly extend pending discovery deadlines in individuals matters in which the United States has filed Answers. There are eleven CLJA actions before Honorable Judge Terrence W. Boyle in which the United States has answered complaints but has not completed individual case focused meet and confer discovery conferences with individual plaintiff's counsel or filed a Fed. R. Civ. P. 26(f) Discovery Plan. *See e.g.* Order for Discovery Plan, *Alifante v. United States*, No. 7:23-cv-982-BO-KS, DE 11 (E.D.N.C. July 18, 2023) (ordering the parties to meet and confer regarding a discovery plan). As noted, however, the Parties have conferred numerous times to discuss a Discovery Plan for the CLJA litigation as a whole. Accordingly, out of an abundance of caution and in light of the pending Proposed Case Management Order (DE 17), the Parties request that the Court extend all pending discovery deadlines in individual cases in which the United States has filed Answers up to and through October 2, 2023.

WHEREFORE, Defendant respectfully submits this Unopposed Motion for Extension and further respectfully request the Court enter the attached Proposed Order briefly extending all individual discovery deadlines pending in CLJA cases in which the United States has filed Answers up to and through October 2, 2023.

DATED this 1st day of September, 2023

Respectfully submitted,

/s/ Adam Bain
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Counsel for Defendant

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 1, 2023, a copy of the foregoing document was served on all counsel of record by operation of the court's electronic filing system and can be accessed through that system.

/s/ Adam Bain ADAM BAIN