

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' MOTION FOR PARTIAL SUMMARY JUDGMENT REGARDING
FUTURE OFFSETS**

Pursuant to Fed. R. Civ. P. 56 and Local Civil Rule 56.1, Plaintiffs move for partial summary judgment to deny Defendant's claimed offsets based on potential future awards, benefits, or payments. As explained in the accompanying Memorandum of Law, there is no genuine dispute of fact that any plaintiff's potential future receipt of awards, benefits, or payments under certain government programs is speculative, as confirmed by Defendant's experts' testimony. Both the Camp Lejeune Justice Act and caselaw regarding offsets in other statutes do not permit speculative future offsets. Accordingly, the Court should grant partial summary judgment and deny Defendant's claimed offsets based on potential future awards, benefits, or payments.

[Signatures follow on next page]

DATED this 27th day of April, 2026.

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