## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NORTH CAROLINA SOUTHERN DIVISION Case No. 7:23-cv-897

## IN RE: CAMP LEJEUNE TOXIC WATER EXPOSURE LITIGATION

This document relates to:

ALL CASES

DECLARATION OF J. EDWARD BELL, III IN SUPPORT OF PLAINTIFFS' OPPOSITION TO UNITED STATES' MOTION FOR AN EXTENSION TO RESPOND TO DISCOVERY REQUESTS

I, J. Edward Bell, III, declare as follows:

1. I am a Founding Partner at Bell Legal Group, LLC. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. Exhibit 1 is a true and correct copy of the United States' October 30, 2023

Responses to Plaintiffs' Corrected First Request for Production of Documents.

3. Exhibit 2 is a true and correct copy of a December 22, 2023 email memorializing the positions express by Plaintiffs on a meet and confer from that day.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 19th day of April, 2024 in Georgetown, South Carolina.

<u>/ s/ J. Edward Bell, III</u> J. Edward Bell, III Bell Legal Group, LLC 219 Ridge St. Georgetown, SC 29440 Telephone: (843) 546-2408 jeb@belllegalgroup.com Lead Counsel for Plaintiffs