

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
Case No. 7:23-cv-00897

IN RE:)	
)	
CAMP LEJEUNE WATER LITIGATION)	JOINT MOTION FOR ADOPTION OF
)	LITIGATION MANAGEMENT
This Document Relates To:)	DATABASE
ALL CASES)	
)	

Plaintiffs’ Lead and Co-Lead Counsel, together with Defendant United States (the “Parties”), jointly file this motion pursuant to Case Management Order No. 2, where the Court ordered “Plaintiffs’ Leadership and counsel for Defendant [to] meet and confer and propose to the Court a litigation-management database within 60 days from the entry of [that] Order.” (D.E. 23 at 13)

The Parties now jointly propose to the Court the adoption of Rubris, Inc.’s (“Rubris”) Crosslink application to serve as a litigation-management database for the Camp Lejeune Water Litigation, to keep track of items on the Court’s docket, including Short Form Complaints. Rubris is a technology and services company with significant experience building databases and providing related services to support the various needs of counsel, plaintiffs, administrators, and courts in complex litigation. The company comes highly recommended by several attorneys who have previously worked with the Rubris team and used the Rubris platform to perform complicated workflows in a single system. The Rubris team impressed members of Plaintiffs’ Leadership with their skill, responsiveness, and speed.

To ensure the efficient and orderly management of this complex litigation, it is important for all counsel representing Plaintiffs in the Camp Lejeune Water Litigation to use a single system to input information that will be submitted to the Court. In particular, it would facilitate the

efficient organization and analysis of information presented to the Court if all Plaintiffs' counsel used the Rubris Crosslink platform to populate, generate, and download Short Form Complaints before filing such complaints with the Court. This would ensure that all data presented to the Court in the complaints would be readily organized and analyzable by the Parties via the Crosslink platform.

The Parties therefore jointly request that the Court enter the attached proposed Order adopting the Rubris Crosslink platform as a litigation-management database for the Camp Lejeune Water Litigation and ordering counsel for all Plaintiffs in the litigation to use that platform to create the Short Form Complaint PDFs for filing. To do that, the Order would also require counsel for all Plaintiffs who intend to file a Short Form Complaint after the date of this order to create a Crosslink account and request access to Crosslink by emailing CrosslinkSupport@rubris.com, using the e-mail subject: "Camp Lejeune ECF and Form Management Crosslink Access." And the Order would require counsel to specify the name, law firm, and e-mail address of each individual requiring access to the Crosslink platform, along with the name of the attorney or firm representative who would serve as the administrator for the firm's account.

The Parties note that this motion applies only to the litigation-management database; other databases, including a global resolution database, will likely become necessary in the future, and such other databases may be created or serviced by separate third parties aside from Rubris.

DATED this 8th day of November 2023.

Respectfully submitted,

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