

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

IN RE:

CAMP LEJEUNE WATER LITIGATION

This Document Relates to:

ALL CASES

**JOINT MOTION FOR EXTENSION TO SUBMIT PROPOSALS FOR SETTLEMENT  
MASTER**

The Plaintiffs' Leadership Group ("PLG") and Defendant United States of America jointly move this Court to extend the deadline to submit proposals to the Court for its appointment of a Settlement Master. In a text Order on December 11, 2023, the Court stated: "[W]here counsel appears to be contemplating the appointment of a Settlement Master in these cases, the Court requests counsel submit names of individuals to be considered for such appointment. Counsel may include these in either of the aforementioned status reports," due December 19, 2023 and January 2, 2024. The PLG has solicited recommendations from among the leadership group and is actively evaluating several candidates. The Defendant has received a recommendation from the U.S. Attorney's office. The parties request that the Court grant the parties an additional two weeks, until January 16, 2024, to assess candidates, exchange names with each other, and attempt to reach agreement on submissions to the Court. The parties continue to make progress on the Settlement Questionnaire, and the short extension requested here will not adversely affect any work being done by the parties. While there are certain questions that remain open and that a Settlement Master

could help resolve, leaving those questions open for the time being will not prevent the parties from continuing to move forward on other parts of the questionnaire. Therefore, the extension requested will have no impact on the overall timeline for the completion of the Settlement Questionnaire.

WHEREFORE, the parties respectfully request an extension of the deadline to submit proposals to the Court for its appointment of a Settlement Master until January 16, 2024.

*[Signature Pages Follow]*

Respectfully submitted, this 29<sup>th</sup> day of January, 2023.

/s/ J. Edward Bell, III

J. Edward Bell, III (admitted *pro hac vice*)  
Bell Legal Group, LLC  
219 Ridge St.  
Georgetown, SC 29440  
Telephone: (843) 546-2408  
jeb@belllegallgroup.com  
*Lead Counsel for Plaintiffs*

/s/ Zina Bash

Zina Bash (admitted *pro hac vice*)  
Keller Postman LLC  
111 Congress Avenue, Ste. 500  
Austin, TX 78701  
Telephone: 956-345-9462  
zina.bash@kellerpostman.com  
*Co-Lead Counsel for Plaintiffs  
and Government Liaison*

/s/ Robin Greenwald

Robin L. Greenwald (admitted *pro hac vice*)  
Weitz & Luxenberg, P.C.  
700 Broadway  
New York, NY 10003  
Telephone: 212-558-5802  
rgreenwald@weitzlux.com  
*Co-Lead Counsel for Plaintiffs*

/s/ Elizabeth Cabraser

Elizabeth Cabraser (admitted *pro hac vice*)  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
275 Battery Street, Suite 2900  
San Francisco, CA 94111  
Phone (415) 956-1000  
ecabraser@lchb.com  
*Co-Lead Counsel for Plaintiffs*

/s/ W. Michael Dowling

W. Michael Dowling (NC Bar No. 42790)  
The Dowling Firm PLLC  
Post Office Box 27843  
Raleigh, North Carolina 27611  
Telephone: (919) 529-3351

BRIAN M. BOYNTON

Principal Deputy Assistant Attorney General  
Civil Division

J. PATRICK GLYNN

Director, Torts Branch  
Environmental Torts Litigation Section

BRIDGET BAILEY LIPSCOMB

Assistant Director, Torts Branch  
Environmental Torts Litigation Section

/s/ Adam Bain

ADAM BAIN  
Senior Trial Counsel, Torts Branch  
Environmental Torts Litigation Section  
U.S. Department of Justice  
P.O. Box 340, Ben Franklin Station  
Washington, D.C. 20044  
E-mail: adam.bain@usdoj.gov  
Telephone: (202) 616-4209

LACRESHA A. JOHNSON

HAROON ANWAR  
DANIEL C. EAGLES  
NATHAN J. BU  
Trial Attorneys, Torts Branch  
Environmental Torts Litigation Section  
*Counsel for Defendant United States of  
America*

mike@dowlingfirm.com  
*Co-Lead Counsel for Plaintiffs*

/s/ James A. Roberts, III  
James A. Roberts, III (N.C. Bar No.: 10495)  
Lewis & Roberts, PLLC  
3700 Glenwood Avenue, Suite 410  
P. O. Box 17529  
Raleigh, NC 27619-7529  
Telephone: (919) 981-0191  
Fax: (919) 981-0199  
jar@lewis-roberts.com  
*Co-Lead Counsel for Plaintiffs*

/s/ Mona Lisa Wallace  
Mona Lisa Wallace (N.C. Bar No.: 009021)  
Wallace & Graham, P.A.  
525 North Main Street  
Salisbury, North Carolina 28144  
Tel: 704-633-5244  
*Co-Lead Counsel for Plaintiffs*