

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION

No. 7:23-CV-897

IN RE: ) **MOTION FOR PARTIAL**  
 ) **SUMMARY JUDGMENT OF**  
CAMP LEJEUNE ) **PLAINTIFFS JAMES KEY, II, CAROL**  
WATER LITIGATION ) **BASSANO, EDDIE MAE MILLER,**  
 ) **AND RACHAEL ARMSTRONG ON**  
This Document Relates to: ) **CLJA LEGAL REPRESENTATIVE**  
ALL CASES ) **PROCEDURE**  
 )

The Plaintiffs' Leadership Group ("PLG"), on behalf of Plaintiffs James Key, II, Carol Bassano, Eddie Mae Miller, and Rachael Armstrong (collectively "Plaintiffs"), moves under Rule 56 of the Federal Rules of Civil Procedure and Local Civil Rules 7.1 and 56.1 for partial summary judgment and requests that the Court find that: (1) all Plaintiffs properly presented their administrative claims to the Department of the Navy and exhausted their administrative remedies under the Camp Lejeune Justice Act; and (2) all Plaintiffs are proper legal representatives under the CLJA.

In support of their Motion, Plaintiffs submit, pursuant to Local Civil Rule 56.1(a)(1), a separate statement in numbered paragraphs of the material facts as to which Plaintiffs contend there is no genuine dispute. Plaintiffs further submit Plaintiffs' memorandum of law in support of their motion for partial summary judgment, filed contemporaneously herewith.

WHEREFORE, Plaintiffs request that this Court grant partial summary judgment as set forth above and in the accompanying memorandum.

This the 1st day of May, 2024.

/s/ J. Edward Bell, III

J. Edward Bell, III (admitted *pro hac vice*)

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