

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

<b>IN RE:</b>	)	
<b>CAMP LEJEUNE WATER LITIGATION</b>	)	<b>Case No: 7:23-cv-897</b>
	)	
	)	<b>UNITED STATES' MOTION</b>
<b>This Document Relates To:</b>	)	<b>FOR PROTECTIVE ORDER</b>
<b>ALL CASES</b>	)	<b>TO PREVENT THE</b>
	)	<b>DEPOSITION OF DR.</b>
	)	<b>CHRISTOPHER PORTIER</b>

**MOTION**

Defendant United States moves this Court, pursuant to Federal Rules of Civil Procedure 26(b) and 26(c), for a protective order to prevent the deposition of former director of the Agency for Toxic Substances and Disease Registry (ATSDR), Dr. Christopher Portier.

In support of this Motion, the United States submits and relies upon its accompanying Memorandum in Support, the Declaration of Joshua G. Carpenito, and the exhibits attached hereto.

Dated: May 23, 2024

Respectfully Submitted,

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Principal Deputy Assistant Attorney General  
Civil Division

J. PATRICK GLYNN  
Director, Torts Branch

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*/s/ Joshua Carpenito* \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 23, 2024, a copy of the foregoing document was served on all counsel of record by operation of the court's electronic filing system and can be accessed through that system.

/s/ Joshua Carpenito  
Joshua Carpenito