

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

IN RE:

CAMP LEJEUNE WATER LITIGATION

**DEFENDANT THE UNITED STATES OF
AMERICA'S MOTION FOR FINAL
SUPPLEMENTATION DEADLINE
(Fed. R. Civ. P. 6(b)(1), 16(b)(4))**

This Document Relates To:

ALL CASES

The United States respectfully moves, pursuant to Rules 6(b)(1) and 16(b)(4) of the Federal Rules of Civil Procedure and 7.1 of the Local Civil Rules, the Court to amend the Pretrial Scheduling Orders (D.E. 270, 332, 414, 630) to include deadlines for the supplementation of discovery as follows: (i) a date certain on or before which fact discovery must be supplemented, subject to a good cause exception under Rule 16(b)(4); (ii) any supplemental expert reports limited to addressing supplemental materials disclosed after the expert's last report must be disclosed within 30 days of the deadline for supplementation of fact discovery; and (iii) any supplemental depositions of experts limited to supplemental opinions and supplemental materials considered must be completed within 30 days of the deadline for supplemental opinions.¹

In support of this Motion, the United States relies on the accompanying Memorandum of Law. Specifically, as explained in the Memorandum of Law, this Court has the authority to set such deadlines for the supplementation of discovery and doing so advances judicial efficiency and

¹ The United States does not intend to reopen expert discovery or for this proposal to permit supplemental expert reports on issues unrelated to any fact discovery materials timely supplemented under this proposal.

This Motion also does not affect the Joint Motion to Amend that the Parties filed on March 16, 2026 (D.E. 826) concerning motions practice and briefing for damages experts.

trial preparations. The United States respectfully asks that the Court grant this Motion and the relief requested. A proposed order is attached.

Dated: March 18, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2026, I electronically filed the foregoing using the Court's Electronic Case Filing system, which will send notice to all counsel of record.

/s/ David R. Ortiz
David R. Ortiz

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NO. 7:23-CV-897**

IN RE:

CAMP LEJEUNE WATER LITIGATION

**[PROPOSED] AMENDED PRETRIAL
SCHEDULING ORDER**

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Pursuant to Federal Rules of Civil Procedure 6(b)(1) and 16(b)(4), and good cause having been shown, the Court amends its Pretrial Scheduling Order (D.E. 630) as follows and hereby orders that:

- 1) All fact discovery must be supplemented on or before _____, _____, 2026;
- 2) Any supplemental expert reports limited to addressing supplemental materials disclosed after the expert's last report must be disclosed within 30 days of the deadline for supplementation of fact discovery;¹ and
- 3) Any supplemental depositions of experts limited to any supplemental opinions and supplemental materials considered must be complete within 30 days of the deadline for supplemental expert reports.

SO ORDERED. This ___ day of _____, 2026.

Robert B. Jones, Jr.
United States Magistrate Judge

¹ This Paragraph does not permit supplementation of expert reports on issues unrelated to any fact discovery materials timely supplemented under Paragraph 1 of this Order.