

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

IN RE:)	Case No. 7:23-cv-897
CAMP LEJEUNE WATER LITIGATION))	
This Document Relates To:)	PLAINTIFFS' UNOPPOSED MOTION
)	TO EXTEND DEADLINE TO RESPOND
ALL CASES)	TO DEFENDANT'S MOTION FOR
)	FINAL SUPPLEMENTATION
)	DEADLINE [D.E. 827]
)	

The Plaintiffs' Leadership Group ("PLG"), with the consent of the Defendant, respectfully moves the Court under Local Rule 6.1 for leave to file its response to Defendant's Motion for Final Supplementation Deadline [D.E. 827] by April 8, 2026. Under Local Rule 7.1(c)(1), Defendant's motion regarding deadlines for supplemental discovery productions, expert reports, and depositions is a discovery motion, because it seeks to regulate, extend, modify, or limit procedures described in Rules 26 through 37 of the Federal Rules of Civil Procedure. Under Local Rules 7.1(f)(2) and 7.1(g)(2), the PLG's deadline to respond is April 1, 2026, and no reply is permitted.

The PLG has conferred with Defendant regarding efforts to resolve the Motion, in whole or in part, and Defendant has consented to extending the PLG's response deadline to April 8 to allow the parties to continue discussions to clarify their positions on the issues raised in Defendant's motion and potentially resolve the Motion, in whole or in part.

A proposed order is attached.

Dated: March 26, 2026

/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@belllegalgroup.com

Lead Counsel for Plaintiffs

/s/ Elizabeth J. Cabraser

Elizabeth J. Cabraser (admitted *pro hac vice*)
Lief Cabraser Heimann & Bernstein, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111
Telephone: (415) 956-1000
ecabraser@lchb.com

Co-Lead Counsel for Plaintiffs

/s/ Robin L. 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/ Mona Lisa Wallace

Mona Lisa Wallace (N.C. Bar No.: 009021)
Wallace & Graham, P.A.
525 North Main Street
Salisbury, NC 28144
Tel: 704-633-5244
mwallace@wallacegraham.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, NC 27611 Telephone:
(919) 529-3351
mike@dowlingfirm.com

Co-Lead Counsel for Plaintiffs

/s/James A. Roberts, III

James A. Roberts, III
Lewis & Roberts, PLLC
3700 Glenwood Ave., Ste. 410
Raleigh, NC 27612
Telephone: (919) 981-0191
jar@lewis-roberts.com

Co-Lead Counsel for Plaintiffs