

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)
)
This Document Relates to:)
)
ALL CASES)

**PLAINTIFFS' MOTION TO SEAL EXHIBITS TO D.E. 863 SUPPORTING
PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT REGARDING
FUTURE OFFSETS**

Defendant recently informed Plaintiffs that they inadvertently filed exhibits (D.E. 863-1, 863-2, 863-3, and 863-4) of deposition transcripts containing unredacted dates of birth that are required to be sealed from public view under Fed. R. Civ. P. 5.2. Defendant requested that Plaintiffs address the issue by removing the unredacted dates of birth from the public docket and filing copies redacting those dates of birth.

Accordingly, and pursuant to Local Rule 79.2, Plaintiffs respectfully request that this Court seal the exhibits filed at D.E. 863-1, 863-2, 863-3, and 863-4.

Attached hereto Plaintiffs file redacted copies of the same exhibits, which are identical to the originally filed exhibits besides the redaction of each deponent's month and day of birth. Plaintiffs respectfully request that this Court order that the attached redacted copies shall serve as the publicly filed versions of the exhibits attached to Plaintiffs' Appendix to their Local Civil Rule 56.1 Statement of Material Facts [D.E. 863] in support of their Motion for Partial Summary Judgment Regarding Future Offsets [D.E. 860].

[Signatures follow on next page]

DATED this 11th day of May, 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/ 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

/s/ Elizabeth J. Cabraser

Elizabeth J. Cabraser (admitted *pro hac vice*)
Lieff 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
Telephone: 704-633-5244
mwallace@wallacegraham.com

Co-Lead Counsel for Plaintiffs