## 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' LEADERSHIP GROUP MOTION FOR RELIEF FROM E.D.N.C. LOCAL CIVIL RULE 56.1(a)

The Plaintiffs' Leadership Group ("PLG") respectfully moves for leave to file PLG's Motion For Partial Summary Judgment On Issue Of Specific Causation without an accompanying Statement of Undisputed Material Facts. In support, the PLG states:

1. The PLG is contemporaneously filing its Motion for Partial Summary Judgment On Issue of Specific Causation (the "Motion").

2. The Motion presents a pure question of law related to the interpretation of the causation element of the Camp Lejeune Justice Act. Pub. L. No. 117-168, § 804, 136 Stat. 1802, 1802-04 (2022) (to be codified at 28 U.S.C. § 2671 note).

3. There are no facts—disputed or otherwise—that the Court need consider in order to adjudicate the Motion.

4. Therefore, pursuant to E.D.N.C. Local Civil Rule 56.1(b), the PLG respectfully requests that the parties be granted relief from E.D.N.C. Local Civil Rule 56.1(a)'s requirement to file a Statement of Material Facts (and an opposing statement), since such statements are "inappropriate" under the circumstances. *See* E.D.N.C. Local Civil Rule 56.1(b).

WHEREFORE, the PLG respectfully requests that the parties be relieved of any obligation,

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pursuant to E.D.N.C. Local Civil Rule 56.1(a), to file a statement of material facts or opposing

statement of material facts in connection with the PLG's Motion For Partial Summary Judgment On

Issue of Specific Causation.

Respectfully submitted, this 15th day of January, 2024.

#### /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 Cabraser

Elizabeth Cabraser (admitted *pro hac vice*) LIEFF CABRASER HEIMANN & BERNSTEIN, LLP 275 Battery Street, Suite 2900 San Francisco, CA 94111 Phone (415) 956-1000 ecabraser@lchb.com *Co-Lead Counsel for Plaintiffs* 

### /s/ Robin 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, North Carolina 28144 Tel: 704-633-5244 *Co-Lead Counsel for Plaintiffs*  <u>/s/Zina Bash</u> Zina Bash (admitted *pro hac vice*) Keller Postman LLC 111 Congress Avenue, Ste. 500 Austin, TX 78701 Telephone: 956-345-9462 zina.bash@kellerpostman.com *Co-Lead Counsel for Plaintiffs and Government Liaison* 

#### /s/ W. Michael Dowling

W. Michael Dowling (NC Bar No. 42790) The Dowling Firm PLLC Post Office Box 27843 Raleigh, North Carolina 27611 Telephone: (919) 529-3351 mike@dowlingfirm.com *Co-Lead Counsel for Plaintiffs* 

### /s/ James A. Roberts, III

James A. Roberts, III (N.C. Bar No.: 10495) Lewis & Roberts, PLLC 3700 Glenwood Avenue, Suite 410 P. O. Box 17529 Raleigh, NC 27619-7529 Telephone: (919) 981-0191 Fax: (919) 981-0199 jar@lewis-roberts.com *Co-Lead Counsel for Plaintiffs* 

#### /s/ John. F. Bash

John F. Bash (admitted *pro hac vice*) Quinn Emanuel Urquhart & Sullivan LLP 300 W. 6th St., Suite 2010 Austin, TX 78701 Phone (737) 667-6100 johnbash@quinnemanuel.com *Member, Plaintiffs' Executive Committee Co-Chair, Law and Briefing Subcommittee*  <u>/s/ A. Charles Ellis</u> A. Charles Ellis (N.C. Bar No.: 010865) Ward and Smith P.A. Post Office Box 8088 Greenville, NC 27835-8088 Telephone: (252) 215-4000 ace@wardandsmith.com *Liaison Counsel for Plaintiffs* 

<u>/s/ Hugh R. Overholt</u> Hugh R. Overholt (NC Bar No. 016301) Ward and Smith P.A. Post Office Box 867 New Bern, NC 28563-0867 Telephone: (252) 672-5400 hro@wardandsmith.com *Liaison Counsel for Plaintiffs* 

# **CERTIFICATE OF SERVICE**

I hereby certify that on January 15, 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.

<u>/s/ J. Edward Bell, III</u> J. Edward Bell, III