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*	PLAINTIFF LEADERSHIP GROUP'S ADMINISTRATIVE MOTION FOR AN ORDER REQUIRING A CENSUS OF PLAINTIFFS' CASES IN AID OF RESOLUTION

This motion is brought by the Plaintiffs Leadership Group ("PLG") to seek an order from the Court to facilitate its efforts to obtain information essential to achieving a global resolution of the Camp Lejeune Justice Act (CLJA) litigation. In the event there is a global resolution, which the PLG continues to make its highest priority, the Court will exercise its jurisdiction to assure equitable distribution and enforcement of that settlement. As such, the instant motion, as explained below, asks the Court to order attorneys with CLJA cases, whether filed in this Court or in the administrative process, to submit census data, as set forth below, for each of their clients who allege a disease set forth on Exhibit A to this motion. This information is vital to continuing discussions relating to, and hopefully succeeding in reaching, a global resolution with the United States.

As a preliminary matter, the PLG wishes to inform the Court, as it has previously informed the United States, that it intends to continue to negotiate a global settlement with the United States only for the diseases listed on Exhibit A. However, the PLG takes no position on

any other disease or condition. To our understanding, there are over 200 individual diseases and medical conditions alleged in the administrative process. The PLG will undertake appropriate outreach measures to ensure that all counsel with CLJA cases are made aware of the diseases for which the PLG intends to pursue a global resolution in their leadership capacity. In addition to the instant motion, the PLG will hold webinars with counsel, post Exhibit A on the website, and disseminate email notice to all counsel of record and known counsel for CLJA claimants. The census data sought in this motion relates only to claimants or plaintiffs who have been diagnosed with one or more of the diseases on Exhibit A.

For each claimant or plaintiff with an Exhibit A disease ("Covered Disease"), the attorney representing that client (or the plaintiff/claimant if he or she is proceeding pro se) would be required to submit limited, available settlement-targeted information. This information will be uploaded to a secure portal on Rubris that can only be reviewed by the PLG and, upon entry of an appropriate protective order, the Department of Justice. The information the PLG requests to be included in the census is (a) the client's name, (b) the last 4 digits of their social security number, (c) their administrative claim number, and (d) the Exhibit A Diseases for which they have been diagnosed. For attorneys with multiple clients, the PLG will create a spreadsheet and process that allows individual counsel to upload their clients' census data in bulk. The census information will be due to be submitted 60 days after a start date set by the Court. Failure to comply with the Order could preclude a client from participating in a global resolution.

If the Court grants the instant motion, the PLG respectfully requests 30 days before the start date to establish procedures with Rubris to develop a system to accept the data, that will ensure that all counsel are aware of the Order and their obligation to comply with its terms, and that the information is uploaded provided is kept in strict confidence, as well as any other

administrative matters necessary for compliance with the Order, that will be subject to the Court's review and approval.

The PLG recognizes that the requested order does not advance a resolution of all CLJA claims filed in the administrative process and/or in this Court. As stated above, the PLG believes that claimants have alleged more than 200 alleged diseases and conditions in the administrative process. The PLG proposes that, for those claimants/plaintiffs who do not allege a Covered Disease, the PLG and the Department of Justice be ordered to meet and confer to propose a process for addressing those claims and submit that to the Court for its consideration at a later date.

Wherefore, the PLG respectfully requests that the Court grant the instant motion and order all claimants and/or plaintiffs with Covered Diseases to submit the census data within 60 days of the entry of this Order.

Dated: October 23, 2026.

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