

**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

[PROPOSED] ORDER REGARDING
PLAINTIFFS' LEADERSHIP GROUP'S
ADMINISTRATIVE MOTION FOR AN
ORDER REQUIRING A CENSUS OF
PLAINTIFFS' CASES IN AID OF
RESOLUTION

In order to heed the overarching admonition of Fed. R. Civ. P. 1, to advance the progress toward resolution and secure the just, speedy, and inexpensive determination of the Camp Lejeune Water Litigation and related proceedings, and having considered the motion of the Plaintiffs Leadership Group for an order requiring a census of plaintiffs' cases in aid of resolution, and any objections thereto, it is hereby Ordered as follows:

The Court orders attorneys who represent clients who allege a disease set forth on Exhibit A (or the plaintiff/claimant if he or she is proceeding pro se) to provide the following information to the PLG within 60 days of this Order: (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. The census will be uploaded to a secure portal on Rubris overseen by the PLG and can only be reviewed by the PLG and, upon entry of an appropriate protective order, the Department of Justice.

The Court orders the PLG to 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.

Failure by Plaintiffs' counsel to comply with the Order could preclude their non-complying client(s) from participating in a global resolution.

The Court will issue an appropriate Order at a later date to address adjudication of claims before this Court that do not allege a disease on Exhibit A. 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.

The Court grants the PLG 30 days to develop a system, subject to the Court's approval, to accept the data, to ensure that all counsel are aware of the Order and their obligation to comply with its terms, and to ensure that the census information is kept in strict confidence, as well as any other administrative matters necessary for compliance with the Order.

Dated: October ___, 2026.