

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
Case No. 7:23-cv-897

IN RE:)	
)	
CAMP LEJEUNE WATER LITIGATION)	JOINT STATUS REPORT AND
)	SUBMISSION OF PROPOSED CASE
This Document Relates To:)	MANAGEMENT ORDER
ALL CASES)	
)	

Plaintiffs’ Lead Counsel and Co-Lead Counsel (collectively “Plaintiffs’ Leadership”) and counsel for Defendant United States of America (“Defendant,” collectively with Plaintiffs’ Leadership the “Parties”) respectfully submit to this Honorable Court a Proposed Case Management Order (Attachment A), per the Parties’ Joint Status Report of July 28, 2023 (DE 11), where the Parties contemplated providing a Proposed Case Management Order with “an imminent deadline for filing a master complaint, a deadline for a master responsive pleading, and other case-related deadlines pertaining to the prompt completion of discovery and the commencement of bellwether trials.” *Id.* p. 1. The Parties committed to the Court that, on or before August 28, 2023, they would provide a Proposed Case Management Order that “will establish a deadline for filing a master complaint, short-form complaint, and master responsive pleading, among other things.” *Id.* ¶¶ 6, 8.

The Parties have met, both in person and virtually, numerous times to discuss the Proposed Case Management Order and have collaboratively reached agreement on many salient issues—including a Proposed Short Form Complaint (Attachment D). Notwithstanding the Parties’ reaching significant consensus, there are two key areas of divergence: (i) the manner in which plaintiffs are selected for trial; (ii) the timeline for discovery and trials. Plaintiffs’ Leadership and

Defendant, therefore, have included separate proposed language for Section XI of the Proposed Case Management Order, “Discovery and Trial Plan,” and submit statements in support of each Party’s alternative version (Attachments B and C).

Accordingly, the Parties hereby submit for the Court’s consideration the following:

- 1) Proposed Case Management Order, which includes both Parties’ alternative versions of Section XI (Attachment A).
- 2) Plaintiffs’ Leadership’s statement in support of Plaintiffs’ version of Section XI (Attachment B).
- 3) Defendant’s statement in support of Defendant’s version of Section XI (Attachment C).
- 4) Proposed Short Form Complaint (Attachment D).

WHEREFORE, the Parties respectfully submit this Joint Status Report.

DATED this 28th day of August 2023.

Respectfully submitted,

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