

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA**

JIMMY RAY CAUTHEN;	4:23-cv-00028-M
RICHARD LEE SCOTT;	4:23-cv-00032-M
STEPHEN M. WILLIAMS;	7:23-cv-00024-M
BRUCE WAYNE HILL;	7:23-cv-00028-M
JAMES S. AGEE;	7:23-cv-00033-M
RENA STEINGRANDT CROUCHER and ANTHONY CROUCHER;	7:23-cv-00035-M
JOHN O'RYAN and LARA O'RYAN;	7:23-cv-00036-M
BRANDIE H. STONE, as Personal Representative of the Estate of PATRICK E. LESTER;	7:23-cv-00038-M
MICHAEL DZIURGOT;	7:23-cv-00039-M
LUCKY SHERRI GREEN;	7:23-cv-00046-M
DAVID WHITE and LANA WHITE;	7:23-cv-00047-M
THERESA MARIE ANDREWS;	7:23-cv-00048-M
JOSE RODRIGUEZ;	7:23-cv-00051-M
LISA ROBERTS ALLEN;	7:23-cv-00059-M
DANIEL HAMMACK;	7:23-cv-00060-M
MICHAEL PIPPIN;	7:23-cv-00067-M
JOEL DEAN PEDALINE;	7:23-cv-00078-M
SANDRA T. CLINE;	7:23-cv-00102-M
BENJAMIN LAMAR URQUHART;	7:23-cv-00104-M
SAMUEL EZELL, as administrator for the Estate of PRISCILLA LANE EZELL;	7:23-cv-00113-M

RICHARD CHARETT;	7:23-cv-00122-M
JEFFREY FIRDA;	7:23-cv-00123-M
JEFFREY L. HOPKINS;	7:23-cv-00127-M
RONNIE MANNS;	7:23-cv-00128-M
SHERRY ANN MILLER;	7:23-cv-00133-M
GENA PARKHURST;	7:23-cv-00135-M
DENNIS R. PETERSEN;	7:23-cv-00137-M
DONALD MOBLEY;	7:23-cv-00142-M
PATRICIA ANN DAVIS;	7:23-cv-00143-M
CAROL MARIE SULLIVAN;	7:23-cv-00146-M
JENNIFER CARTER;	7:23-cv-00150-M
ENNIS TOBLER;	7:23-cv-00152-M
DAVID MCDOUGAL;	7:23-cv-00153-M
SANDRA MCCAVANAGH;	7:23-cv-00157-M
JEROME M. ENSMINGER, as Personal Representative of the Estate of JANE ENSMINGER;	7:23-cv-00161-M
Plaintiffs,	
v.	
UNITED STATES OF AMERICA,	
Defendant.	

UNITED STATES' UNOPPOSED MOTION TO EXTEND
TIME TO FILE ANSWERS

The United States of America respectfully moves for an extension of time, up to and including May 31, 2023, in which to respond to Plaintiffs' complaints in the above-captioned cases. At present, in the above-captioned cases, the United States faces responsive-pleading deadlines on various dates between now and the end of April 2023. In support of this motion, the United States submits the following:

1. On April 5, 2023, Judge James C. Dever III held a status conference to discuss various procedural topics, including the possibility of establishing a master docket and plaintiff leadership that may apply to all Camp Lejeune Justice Act cases filed in this Court. *See, e.g.*, Order Setting Hr'g, *Rees v. United States*, No. 4:23-cv-00022-D (E.D.N.C. Mar. 20, 2023) (Judge Dever), ECF No. 7 (setting hearing in all Camp Lejeune Justice Act cases pending before Judge Dever).
2. Given that the potential procedures discussed during the April 5, 2023, hearing may affect the filing of answers, the United States believes that it would be more efficient for the Court and all parties if an extension for filing individual answers is granted in case the anticipated Order on the hearing addresses the filing of individual answers.
3. This motion is not made for the purpose of delay, but instead, to await the Court's decision on any processes or procedures for Camp Lejeune Justice Act Cases.
4. For the same reasons given in this Motion, the Court has granted extensions on other Camp Lejeune Justice Act cases within the last week. *See, e.g.*, Text Order, *Whatley v. United States*, 7:23-cv-00075 (E.D.N.C. Apr. 12, 2023).

5. Counsel for Plaintiffs in each of the above-captioned cases have been contacted and have no objection to this motion.

Therefore, the United States requests an extension of time up to and including May 31, 2023, in which to respond to Plaintiffs' complaints.

Dated: April 14, 2023

Respectfully Submitted,

BRIAN BOYNTON
Principal Deputy Assistant Attorney General
Civil Division

J. PATRICK GLYNN
Director, Torts Branch

BRIDGET BAILEY LIPSCOMB
Assistant Director

ADAM BAIN
Senior Trial Counsel

/s/ LaCresha A. Johnson
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Attorney inquiries to DOJ regarding the
Camp Lejeune Justice Act:
(202) 353-4426

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2023, 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.

/s/ LaCresha A. Johnson
LACRESHA A. JOHNSON

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

ORDER

JIMMY RAY CAUTHEN;	4:23-cv-00028-M
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Plaintiffs,	
v.	
UNITED STATES OF AMERICA,	
Defendant.	

For good cause having been shown upon the motion of the United States of America for an extension of time in which to respond to Plaintiff's complaint in each of the above-captioned cases, it is hereby

ORDERED that the United States of America have up to and including May 31, 2023,

in which to respond to Plaintiff's complaint in each of the above-captioned cases.

So ORDERED THIS _____ day of _____, 2023.

Richard E. Myers, II
United States District Court Judge