

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)	
)	PLAINTIFFS’ LEADERSHIP GROUP’S
This Document Relates To:)	REPORT AND STATUS UPDATE
ALL CASES)	
)	

Plaintiffs’ Lead and Co-Lead Counsel (“Plaintiffs’ Leadership Group”) respectfully provide this Honorable Court and the public with the following Report and Status Update.

(1) As required by this Court’s July 19, 2023, Order (DE 10), Plaintiffs’ Leadership Group convened, deliberated, and selected the members of the Plaintiffs’ Executive Committee (“PEC”) and Plaintiffs’ Steering Committee (“PSC”).

(2) Plaintiffs’ Leadership Group presented to the Court the list of PEC and PSC members by letter dated July 27, 2023. The members of the PEC and PSC are as follows:

Plaintiffs’ Executive Committee
Aimee Wagstaff, Wagstaff Law Firm
John Bash, Quinn Emanuel Urquhart & Sullivan LLP
Brian Barr, Levin Papantonio Rafferty Proctor Buchanan O'Brien Barr Mougey, P.A.
Jayne Conroy, Simmons Hanley Conroy
Kevin Dean, Motley Rice
Lynwood Evans, Ward & Smith
Rhon Jones, Beasley Allen
Howard Nations, The Nations Law Firm
Jim Onder, Onder Law
John Romano, Romano Law Group
Patrick Wallace, Milberg Coleman Bryson Phillips Grossman
Jay Ward, McGowan, Hood, Felder & Phillips
Robert Kinsman, Krause and Kinsman Law Firm

Plaintiffs' Steering Committee
Elliot Abrams, Cheshire Parker Schneider, PLLC
Janet Ward Black, Ward Black Law
David Kirby, Edwards Kirby
Gary Jackson, James Scott Farrin
Stacey Miller, Miller Law Group, PLLC
Scott Overholt, Overholt Law Firm PC
Adam Pulaski, Pulaski Kherkher, PLLC
Roopal Luhana, Chaffin Luhana, LLP
Alejandro Blanco, The Blanco Law Firm
Greg Cade, Environmental Law Group
Grant Davis, Davis, Bethune & Jones LLC
Mark Mandell, Mandell Boisclair & Mandel Ltd.
David A. Wenner, Snyder & Wenner, P.C
Joseph Anderson, Pangia Law Group

(3) Plaintiffs' Leadership Group convened, deliberated, and organized the members of Plaintiffs' Leadership Group and those attorneys in the PEC and PSC into the various Subcommittees required by this Court's July 19, 2023 Order (DE 10).

(4) The Science and Experts Subcommittee met in person over two days on August 16 and August 17, 2023, and made extensive progress towards discussing the science that lies at the core of this litigation and the retention of necessary experts. The Discovery & ESI Subcommittee also met in-person and has begun inventorying relevant documents and data for use in this litigation. Other Subcommittees have met virtually and made substantial progress toward defining their respective tasks and objectives, and have begun executing on those.

(5) Government Liaison Counsel and other members of Plaintiffs' Leadership Group have exchanged with government counsel drafts of a Proposed Initial Case Management Order. They also convened a full-day meeting in Washington, DC, on August 15, 2023, to further negotiate the terms of that Proposed Order. Plaintiffs' Leadership Group will file a Proposed Initial Case Management Order on or before August 28, 2023, as indicated in the previous status update.

(6) Plaintiffs' Leadership Group and government counsel have discussed components of the Proposed Short Form Complaint and a final draft is nearly complete. The Proposed Master Complaint is also near completion.

(7) Plaintiffs' Leadership Group plan to launch a public-facing website, as ordered by the Court, by August 25, 2023, to keep the public apprised of the status of this litigation.

(8) Plaintiffs' Leadership Group intends to move for the entry of a proposed Common Benefit Order once the Proposed Initial Case Management Order is entered.

(9) A motion to reconsider (DE 13) this Court's July 19, 2023 Case Management Order appointing Plaintiffs' Leadership Group has been filed by a law firm out of South Carolina. Plaintiffs' Leadership Group will be filing an opposition to the motion by August 28, 2023.

(10) It is the intention of Plaintiffs' Leadership Group to file regular Reports and Status Updates, to keep the Court, counsel, Plaintiffs, and the public informed. Plaintiffs' Leadership Group intends to post these reports and other publicly filed information on the website that the Court has directed Plaintiffs' Leadership Group to establish and maintain for this purpose.

Respectfully submitted, this 18th day of August, 2023.

/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

/s/ Zina Bash
Zina Bash (admitted *pro hac vice*)
Keller Postman LLC
111 Congress Avenue
Suite 500
Austin, TX 78701
Telephone: 956-345-9462
zina.bash@kellerpostman.com
Co-Lead Counsel and Government Liaison

/s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser (admitted *pro hac vice*)
Lieff Cabraser Heimann & Bernstein, LLP
275 Battery Street, 29th Floor

/s/ W. Michael Dowling
W. Michael Dowling (NC Bar No. 42790)
The Dowling Firm PLLC
Post Office Box 27843
Raleigh, North Carolina 27611

San Francisco, CA 94111
Telephone: (415) 956-1000
Fax: (415) 956-1008
ecabraser@lchb.com
Co-Lead Counsel

Telephone: (919) 529-3351
Fax: (919) 529-3351
mike@dowlingfirm.com
Co-Lead Counsel

/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

/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

/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
Fax: 704-633-9434
Co-Lead Counsel

/s/ Hugh R. Overholt
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

/s/ A. Charles Ellis
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