

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION  
NO. 7:23-CV-00897**

**IN RE:**

**CAMP LEJEUNE WATER LITIGATION      UNITED STATES' UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO  
This Document Relates To:                      RESPOND**

**ALL CASES**

The United States of America respectfully moves for an extension of time, up to and including September 12, 2025, in which to respond to Plaintiffs' Leadership Group's Motion to Apply the Court's July 22, 2025 Order to All Experts (D.E. 515). In support of this motion, the United States submits the following:

1. On September 2, 2025, Plaintiffs' Leadership Group filed a motion (D.E. 515) seeking to apply the Court's July 22, 2025, Order (D.E. 444) to all experts. Under the Court's Discovery Dispute Protocol (D.E. 55), the United States' response is due on September 9, 2025.
2. This motion is not made for the purpose of delay. Good cause exists due to the Parties' Phase II and Phase III September 10, 2025, briefing deadline.
3. The United States has conferred with Plaintiffs' Leadership Group, who does not object to this motion.

Therefore, the United States requests an extension of time up to and including September 12, 2025, in which to respond to Plaintiffs' motion.

Dated: September 4, 2025

Respectfully submitted,

BRETT A. SHUMATE  
Assistant Attorney General,  
Civil Division

JONATHAN D. GUYNN  
Deputy Assistant Attorney General,  
Torts Branch

BRIDGET BAILEY LIPSCOMB  
Chief, Camp Lejeune Justice Act Section

ADAM BAIN  
Special Litigation Counsel

JOSHUA G. CARPENITO  
DAVID R. ORTIZ  
Trial Attorneys

/s/ Joshua G. Carpenito  
Joshua G. Carpenito  
NC Bar No. 60801  
Trial Attorney  
United States Department of Justice  
Civil Division, Torts Branch  
Camp Lejeune Justice Act Section  
310 New Bern Ave,  
Raleigh, NC 27601  
(202) 880-1518  
Joshua.g.carpenito@usdoj.gov

Attorney inquiries to DOJ regarding CLJA:  
(202) 353-4426

*Attorneys for Defendant,  
United States of America*

### **CERTIFICATE OF SERVICE**

I hereby certify that on September 4, 2025, I electronically filed the foregoing using the Court's Electronic Case Filing system, which will send notice to all counsel of record.

/s/ Joshua G. Carpenito  
Joshua G. Carpenito