

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 Pleading Relates to: )  
ALL CASES )

**PLAINTIFFS' LEADERSHIP GROUP'S MOTION TO SEAL THE MEMORANDA OF  
LAW FILED IN SUPPORT OF THE UNITED STATES' MOTIONS TO EXCLUDE DR.  
ROGER MOORE AND DR. HARESH THARWANI**

The Plaintiffs' Leadership Group (the "PLG") hereby moves the Court to seal the filed Memoranda of Law in Support of the United States' Motion to Exclude Dr. Roger Moore (D.E. 572) and Dr. Haresh Tharwani (D.E 595), and the exhibits (D.E. 572.1-572.21 and D.E. 595.1-595.4, respectively) attached thereto (collectively, the "Memoranda"). These Memoranda include highly sensitive mental health medical information concerning three (3) Track 1 Trial Plaintiffs, and these Trial Plaintiffs' privacy interests in that mental health information far outweigh the public's right of access to these judicial records. No reasonable alternative to sealing exists.

The PLG sought Defendant United States of America's ("Defendant") position on this motion. Defendant responded that it does not oppose the present motion.

This the 17th day of September, 2025.

/s/ J. Edward Bell, III

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**CERTIFICATE OF SERVICE**

I, J. Edward Bell, III, hereby certify that the foregoing document was electronically filed on the Court's CM/ECF system on this date, and that all counsel of record will be served with notice of the said filing via the CM/ECF system.

This the 17th day of September, 2025.

*/s/ J. Edward Bell, III*

J. Edward Bell, III