

**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 Document Relates To:

ALL CASES

**UNITED STATES' MOTION TO SEAL
AND MAINTAIN CONFIDENTIALITY
DESIGNATION OF EXHIBIT D TO
PLAINTIFFS' MOTION TO EXCLUDE
DEFENSE EXPERT DR. JULIE
GOODMAN**

Pursuant to Local Civil Rule 79.2 and the Second Amended Stipulated Protective Order (“CMO 15”), D.E. 266, the United States respectfully moves this Court to seal and maintain the confidentiality status of Exhibit D to Plaintiffs’ Motion to Exclude Defense Expert Dr. Julie Goodman (the “Gradient Invoices”), which was provisionally filed under seal (D.E. 622-5), along with the supporting memorandum (D.E. 622) and other exhibits. The United States produced the Gradient Invoices as confidential in reliance on the terms of CMO 15, and any presumed right of public access is outweighed by the interest in protecting confidential business information that is not available to the general public. Accordingly, for the reasons discussed more fully in the accompanying memorandum, the United States requests that the Court seal the Gradient Invoices filed as Docket Entry 622-5, permit narrow redactions of Plaintiffs’ brief discussing information contained in the Gradient Invoices that has not previously been made public (D.E. 622), and maintain the Confidentiality designation of the Gradient Invoices as agreed by the Parties under CMO 15. A proposed order is attached.

Dated: September 22, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2025, I electronically filed the foregoing using the Court's Electronic Case Filing system, which will send notice to all counsel of record.

/s/ Jennifer E. Adams
JENNIFER E. ADAMS