

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
No. 7:23-CV-897

IN RE:)	PLAINTIFF LEADERSHIP
CAMP LEJEUNE WATER LITIGATION)	GROUP'S MOTION TO STRIKE
)	DR. JULIE GOODMAN'S
This Pleading Relates to:)	UNTIMELY AND IMPROPER
)	SUPPLEMENTAL EXPERT
ALL CASES.)	REPORTS
)	

Pursuant to Federal Rules of Civil Procedure 16 and 26(e), Plaintiff Leadership Group moves to strike Dr. Julie Goodman's supplemental materials, which she attached to Defendant's opposition to Plaintiffs' motion to exclude her initial reports. (D.E. 686-2)-(D.E. 686-11). Rule 26(e) requires a party to supplement when it "learns that in some material respect the disclosure or response is incomplete or incorrect." *Pierce v. N.C. State Bd. of Elections*, No. 4:23-cv-193, 2024 WL 5170738, at *3 (E.D.N.C. Dec. 18, 2024) (J. Dever); *see also* Fed. R. Civ. Proc. 26(e)(1)(A). Supplementation is not a basis to provide new expert opinions, but is rather for correcting inadvertent errors or omissions. *Gallagher v. S. Source Packaging, LLC*, 568 F. Supp. 2d 624, 631 (E.D.N.C. 2008) (J. Dever) ("Courts distinguish 'true supplementation' (e.g., correcting inadvertent errors or omissions) from gamesmanship."). Moreover, such supplementation must be made "in a timely manner." Fed. R. Civ. Proc. 26(e)(1)(A).

As detailed in the attached Memorandum, Dr. Goodman's supplemental materials are not proper supplementation under Rule 26(e) both because she provides new conclusions and analysis therein, and because they are untimely. Pursuant to Rule 16, the new materials should be stricken.

Dated: November 18, 2025.

/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@bellegalgroup.com

Lead Counsel for Plaintiffs

/s/ Elizabeth J. Cabraser

Elizabeth J. Cabraser (admitted *pro hac vice*) Lieff Cabraser Heimann & Bernstein,
LLP 275 Battery Street, 29th Floor
San Francisco, CA 94111
Telephone: (415) 956-1000
ecabraser@lchb.com

Co-Lead Counsel for Plaintiffs

/s/ W. Michael Dowling

W. Michael Dowling (NC Bar No. 42790) The
Dowling Firm PLLC
Post Office Box 27843 Raleigh,
North Carolina 27611 Telephone:
(919) 529-3351
mike@dowlingfirm.com

Co-Lead Counsel for Plaintiffs

/s/ James A. Roberts, III

James A. Roberts, III
Lewis & Roberts, PLLC
3700 Glenwood Ave., Ste. 410
Raleigh, NC 27612
Telephone: (919) 981-0191
jar@lewis-roberts.com

Co-Lead Counsel for Plaintiffs

/s/ Robin L. 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 for Plaintiffs

/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
mwallace@wallacegraham.com

Co-Lead Counsel for Plaintiffs

