

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

<b>IN RE:</b>	)	
	)	<b>UNITED STATES' UNOPPOSED</b>
<b>CAMP LEJEUNE WATER LITIGATION</b>	)	<b>MOTION FOR EXTENSION OF TIME</b>
	)	<b>AND OF PAGES TO RESPOND</b>
<b>This Document Relates To:</b>	)	(L. Civ. R. 6.1)
<b>ALL CASES</b>	)	

The United States respectfully moves for an extension of time of twenty-one days in which to respond to Plaintiffs' Motion to Reserve Admissibility Determinations and Expedite Track 1 Bellwether Trials [D.E. 721] and Motion to Strike Dr. Julie Goodman's Untimely and Improper Supplemental Expert Reports [D.E. 724]. Additionally, the United States respectfully moves for an extension of five pages for its responses in opposition to D.E. 721 and D.E. 724. In support of this Motion, the United States submits the following:

1. On November 12, 2025, Plaintiffs' Leadership Group ("PLG") filed a Motion to Reserve Admissibility Determinations and Expedite Track 1 Bellwether Trials. D.E. 721. PLG did not designate the rule under which the Motion was filed. *Id.* If the Motion were a discovery motion, under the Court's Discovery Dispute Protocol, the United States' response would have been due on November 19, 2025. D.E. 55. This Motion was discussed at the November 14, 2025 Status Conference, and the Parties agreed on the record that the United States' response could be filed on or before December 3, 2025 (twenty-one days after filing).
2. PLG's Motion to Reserve Admissibility Determinations and Expedite Track 1 Bellwether Trials exceeds the ten-page limit for discovery motions. *Id.*; D.E. 721.

3. On November 19, 2025, PLG filed a Motion to Strike Dr. Julie Goodman's Untimely and Improper Supplemental Expert Reports. D.E. 724. PLG filed the Motion to Strike Dr. Julie Goodman's Untimely and Improper Supplemental Expert Reports under Rule 16, *id.*, but also referenced Rule 37 in its Memorandum in Support. D.E. 725. The United States' position is that D.E. 724 is, in fact, a discovery motion. Under the Court's Discovery Dispute Protocol, the United States' response would be due on November 26, 2025. D.E. 55.
4. PLG's Motion to Strike Dr. Julie Goodman's Untimely and Improper Supplemental Expert Reports exceeds the ten-page limit for discovery motions. *Id.*; D.E. 724.
5. This Motion is not made for the purpose of delay. Good cause exists due to the Parties' December 12, 2025 Phase II and III briefing deadline, and the December 15, 2025 economic residual expert disclosure. D.E. 414; D.E. 630.
6. The United States has conferred with PLG, which does not object to this Motion.

Therefore, the United States requests an extension of time up to and including December 3, 2025, in which to reply to D.E. 721, as well as an extension of time up to and including December 10, 2025, in which to respond to D.E. 724. Moreover, given the length of PLG's briefs, the United States requests an extension of five pages for a total of fifteen pages for each of its responses in opposition.

Dated: November 21, 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

HAROON ANWAR  
SARA J. MIRSKY  
Acting Assistant Directors

ADAM BAIN  
Special Litigation Counsel

/s/ Giovanni Antonucci  
GIOVANNI ANTONUCCI  
Trial Attorney  
United States Department of Justice  
Civil Division, Torts Branch  
Camp Lejeune Justice Act Section  
1100 L Street NW  
Washington, DC 20005  
(202) 880-6104  
Fax (202) 616-4473  
giovanni.antonucci@usdoj.gov  
N.Y. Bar No. 6096671

Attorney inquiries to DOJ regarding the  
Camp Lejeune Justice Act: (202) 353-4426

*Attorneys for Defendant,  
United States of America*

### **CERTIFICATE OF SERVICE**

I hereby certify that on November 21, 2025 I electronically filed the foregoing using the Court's Case Management/Electronic Case Files system, which will send notice to all counsel of record.

/s/ Giovanni Antonucci  
GIOVANNI ANTONUCCI