

**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 **JOINT MOTION TO HOLD PLAINTIFFS'
This Document Relates To:** **MOTION TO COMPEL IN ABEYANCE**

ALL CASES

The United States of America together with Plaintiffs' Leadership Group ("PLG") respectfully submit this joint motion to hold PLG's Motion to Compel (D.E. 730; "Motion to Compel") in abeyance while the Parties continue to confer in good faith regarding a proposed resolution of the issues raised by that motion.

PLG's Motion to Compel seeks production of records from the United States Marine Corps' ongoing digitization project ("USMC Digitization Records"). The Parties have conferred regarding this request and jointly agree that holding the PLG's Motion to Compel in abeyance is appropriate while the Parties continue good-faith discussions regarding a proposed resolution.

As part of those discussions, the Parties have agreed to an interim framework under which PLG will be permitted limited access to the USMC Digitization Records solely for the purpose of assessing the nature and utility of the data. During this interim process, PLG has agreed that any access or review will be confined to a PLG-only database environment, and that any records accessed or downloaded will not be disclosed outside that environment. The Parties have further agreed that the records will not be used, disclosed, or relied upon beyond this preliminary review unless and until the Parties reach agreement on additional Protective Order provisions governing such use.

These discussions also include a two-step approach to amending the Protective Order. First, the United States anticipates submitting a proposed amended Protective Order addressing confidentiality of the USMC Digitization Records during the interim review period. Second, depending on PLG's assessment of the data and any proposed use of those records, the Parties anticipate that a further amendment to the Protective Order will be necessary to address any additional disclosure or use protocols governing the USMC Digitization Records.

The Parties will be prepared to provide an update to the Court at the next status conference currently scheduled for January 9, 2026. Accordingly, the Parties respectfully request that the Court hold PLG's Motion to Compel in abeyance.

Dated: December 18, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 18, 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
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