## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA 7:23-CV-897

IN RE:	)	
	)	ORDER
CAMP LEJEUNE WATER LITIGATION	)	

The Clerk of Court will maintain a Master Docket case file under the style "In re: Camp LeJeune Water Litigation." The court will enter a later order identifying who is permitted to file in the Master Docket.

The court ORDERS those who would like to serve as Plaintiffs' Leadership Counsel or on Plaintiffs' Steering Committee to submit materials to the court not later than May 26, 2023. The materials should identify: (1) the qualifications; (2) the proposed leadership structure; (3) common fund issues; and (4) proposed length of appointments (such as one year, subject to renewal).

Once the court has determined whether and to what extent it will adopt any proposed leadership structure, the court anticipates seeking input from the plaintiffs on creating a master complaint, input from the defendant on a master answer or other responsive pleading to the master complaint, a process for consolidating discovery, a process for phased discovery, a process for coordinating expert-related motions, a process for coordinating dispositive motions, a process for bellwether selection, a process for trials, and a process for settlement negotiations.

As part of the discovery process, the court anticipates formulating an ESI protocol, resolving issues associated with the scope of discovery, seeking input on use of stipulations to streamline discovery, and seeking input on some form of database with narrowly tailored questions seeking case-crucial information for each plaintiff and the defendant. Cf. In re World Trade Ctr. Disaster Site Litig., 598 F. Supp. 3d 498, 506–22 (S.D.N.Y. 2009).

Some lawyers who are not admitted to the bar of this court have requested permission to appear in multiple Camp Lejeune Justice Act cases pursuant to Local Civil Rule 83.1(e). The court has decided to create a process for lawyers who are not members of the bar of this court to appear in multiple Camp Lejeune Justice Act cases. See Local Civil Rule 1.1 (noting court's authority to alter "these rules" in any particular case). Each lawyer who is not a member of the bar of this court must complete a pro hac vice motion on the form attached to this order. Local counsel shall file each motion electronically in each case in which the out-of-district lawyer seeks to appear, even if that lawyer previously filed a notice of special appearance. The motion shall include the e-mail address and contact information of the lawyer seeking admission and be accompanied by the \$100 fee per lawyer per case. Each lawyer who is admitted pro hac vice pursuant to this process must file a notice of special appearance within ten days of the filing date of the order granting the pro hac vice motion, unless the lawyer previously filed a notice of special appearance prior to the date of this order.<sup>1</sup>

SO ORDERED. This 24th day of April, 2023.

18/1/yers 1

Chief United States District Judge

United States District Judge

United States District Judge

United States District Judge

<sup>&</sup>lt;sup>1</sup> If the lawyer is not already a CM/ECF filer within the EDNC, he or she must submit an Electronic Filing Attorney Registration form within seven days of the order granting the pro hac vice motion.

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA

	DIVISION				
	No				
Plair v. Defe		MOTION FOR ADMISSION <u>PRO HAC VICE</u> and AFFIDAVIT			
	("Loca	al Counsel"), a member in good standing with the			
Bar of the United States Distric	et Court for the E	astern District of North Carolina ("EDNC"), moves			
for the admission of		("Applicant"), who seeks permission to represent			
		("Client") in this			
above-captioned Camp LeJeur	ne Justice Act cas	se.			
By signing this motion	, Local Counsel	and Applicant certify that:			
1. Applicant is a r	nember in good	standing of the bar of the highest court of the State			
or Territory where Applicant r	egularly practice	es law, which is			
2. Applicant pract	tices under the na	ame of or as a member of the following firm:			
Firm name:					
Mailing Address:					
		Facsimile Number:			
Email Address (required):					

with tl	ne Courts in the following jurisdictions:	
3.	Applicant certifies that s/he is also admi	tted to practice before and remains in good standing

- 4. Applicant certifies s/he has never been the subject of any formal suspension or disbarment proceedings; never been denied admission <u>pro hac vice</u> in this or any other jurisdiction or had <u>pro hac vice</u> admission revoked; never had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked; and never received public discipline by any court or lawyer regulatory organization. If Applicant cannot so certify, Applicant must attach a separate explanation including particular information disclosing the disciplinary history or denial of admission.
- 5. Applicant certifies that the client requested Applicant to represent s/he in this matter, along with Local Counsel.
- 6. Applicant agrees to be subject to the Orders of the EDNC, including the Local Rules of the EDNC, and amenable to the disciplinary action of the civil jurisdiction of the EDNC in all respects as if Applicant were a regularly admitted and licensed member of the Bar of this court.
- 7. Local Counsel is satisfied that Applicant is qualified to practice before the Bar of the EDNC.
- 8. The required \$100 fee for admission <u>pro hac vice</u> in this case is being submitted with the filing of this motion.
- 9. Applicant consents to electronic notification and is a registered CM/ECF filer in the EDNC or will submit an Electronic Filing Attorney Registration Form within seven days if this motion is granted.

By signing this M	By signing this Motion, we so certify.				
This, the	day of	, 20			
Local Counsel		Applicant			
Attorney Name: Bar Number: Firm Name:					
Firm Address:					
Firm City/State/Zip: Telephone Number:					
Fax Number:					

Email Address: