## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

NATIONAL VETERANS LEGAL SERVICES PROGRAM, NATIONAL CONSUMER LAW CENTER, and ALLIANCE FOR JUSTICE, for themselves and all others similarly situated, Plaintiffs,

Case No. 1:16-cy-00745-PLF

v.

UNITED STATES OF AMERICA, *Defendant*.

## JOINT STATUS REPORT

Pursuant to the Court's order dated June 30, 2022, the parties file this joint status report to update the Court on the progress of their settlement discussions.

In the April 1, 2022 status report, the parties reported that counsel for the parties had finalized a draft settlement document, and that counsel for Defendant had begun the process of obtaining formal approval of the proposed settlement from the Department of Justice. In the last status report, Defendant reported that, on June 29, 2022, undersigned counsel for Defendant had received notice that the parties' proposed settlement had been approved by the Associate Attorney General, which was the final stage of that review process.

The parties now report that, as of July 27, 2022, a settlement agreement has been fully executed by the parties. Pursuant to the terms of that agreement, Plaintiffs state that they will file on or before September 26, 2022, a motion for an Order Approving Settlement Notice to the Class under Federal Rule of Civil Procedure 23(e)(1), and any necessary supporting papers, including a copy of the settlement agreement. Should the Court grant the motion, it can then establish a

schedule for the balance of the case, including the setting of a hearing to consider approval of the settlement under Federal Rule of Civil Procedure 23(e)(2).

Accordingly, the parties respectfully propose that the stay of proceedings be extended until the filing by Plaintiffs of the above-referenced motion.

Dated: August 12, 2022

MATTHEW M. GRAVES D.C. BAR # 481052 United States Attorney

BRIAN P. HUDAK Chief, Civil Division

By: /s/ JEREMY S. SIMON D.C. BAR #447956 ROBERT A. CAPLEN D.C. Bar #501480 Assistant United States Attorney 601 D. Street, N.W. Washington, D.C. 20530 (202) 252-2528 Jeremy.Simon@usdoj.gov (202) 252-2523 robert.caplen@usdoj.gov

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Respectfully submitted,

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Law Center, Alliance for Justice, and the Class