

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,*

v.

UNITED STATES OF AMERICA,  
*Defendant.*

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

**JOINT STATUS REPORT**

As ordered by this Court on November 16, 2021, the parties file this joint status report to update the Court on the progress of their settlement discussions. On November 15, 2021, the parties submitted a joint status report informing the Court that they have reached an agreement in principle on proposed terms to resolve the matter, subject to the defendant obtaining approval of the proposed terms of settlement from the United States Department of Justice. The parties further informed the Court that they required time to memorialize the proposed terms in a written settlement document in connection with that approval process. Since the last report, the plaintiffs have worked diligently to prepare a draft of the proposed written settlement document, and they submitted that draft document to counsel for the defendant earlier this week. Counsel for the defendant requires time to review the draft and propose any edits. Once counsel for the parties finalize a draft settlement document that is acceptable to them, counsel for defendant would then be in a position to begin the process of obtaining formal approval from the Department of Justice. At this time, the parties are not able to anticipate how long the approval process might take and, accordingly, respectfully propose that they provide a further status report to the Court on or before April 1, 2022, and that the stay of proceedings be extended to April 8, 2022.

Counsel for the parties are available by telephone or videoconference should the Court have any questions.

Dated: January 20, 2022

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Respectfully submitted,

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*Counsel for Plaintiffs National Veterans Legal Services  
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for Justice, and the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 20, 2022, I electronically filed the foregoing Joint Status Report through this Court's CM/ECF system. All participants are registered CM/ECF users and will be served by the CM/ECF system.

/s/ William H. Narwold  
William H. Narwold