

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**

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 had 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. In the status report dated January 20, 2022, the parties reported that plaintiffs had submitted a draft of the proposed written settlement document to counsel for the defendant, and that counsel for the defendant required time to review the draft and propose any edits. In the last 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.<sup>1</sup>

---

<sup>1</sup> In the last status report, the parties proposed that they file a further status report on May 17, 2022, and that the Court continue the stay of proceedings to May 25, 2022. Although the Court did not enter a minute order following that status report, the parties are nevertheless proceeding with the submission of a status report on the date that they had proposed.

The defendant now reports that the proposed settlement is currently undergoing review within the Department of Justice but has not yet reached the final stage of review. 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 June 30, 2022, and that the stay of proceedings be extended to July 12, 2022.

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

Dated: May 17, 2022

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

**BRIAN P. HUDAK**  
Chief, Civil Division

By: /s/ Jeremy S. Simon  
**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

*Counsel for the United States*

Respectfully submitted,

/s/ William H. Narwold  
William H. Narwold  
**MOTLEY RICE LLC**  
One Corporate Center  
20 Church Street, 17th Floor  
Hartford, CT 06103  
860-882-1681  
bnarwold@motleyrice.com

Meghan S. B. Oliver  
**MOTLEY RICE LLC**  
28 Bridgeside Blvd.  
Mt. Pleasant, SC 29464  
843-216-9492  
moliver@motleyrice.com

Elizabeth Smith  
**MOTLEY RICE LLC**  
401 9th St. NW, Suite 1001  
Washington, DC 20004  
202-232-5504  
esmith@motleyrice.com

Deepak Gupta  
Jonathan E. Taylor  
**GUPTA WESSLER PLLC**  
2001 K Street, NW, Suite 850 N  
Washington, DC 20006  
(202) 888-1741

deepak@guptawessler.com  
jon@guptawessler.com

*Counsel for Plaintiffs National Veterans Legal  
Services Program, National Consumer Law  
Center, Alliance for Justice, and the Class*