## 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-cv-00745-PLF

v.

UNITED STATES OF AMERICA, Defendant.

## JOINT STATUS REPORT

As ordered by this Court on June 16, 2021, the parties file this joint status report to update the Court on the progress of their settlement discussions. On June 16, 2021, the parties submitted a joint status report informing the Court they had participated in an all-day mediation session with Professor Eric Green of Resolutions, LLC and were engaged in discussions regarding a potential settlement. Since the last report, the parties have worked diligently towards a resolution, and have continued to meet and exchange proposals. The parties have made progress in their discussions, but some issues require further discussion and the parties need more time to attempt to address them. As a result, the parties request an additional sixty-day extension of the stay of proceedings until November 22, 2021 in order to continue their discussions.

The parties propose that they submit a status report on or before November 15, 2021 updating the Court on the progress of their discussions.

Counsel for the parties are available by telephone or videoconference should the Court have any questions. Dated: September 15, 2021

CHANNING D. PHILLIPS D.C. BAR # 415793 Acting United States Attorney

BRIAN P. HUDAK Acting Chief, Civil Division

By: <u>/s/ Jeremy S. Simon</u> JEREMY S. SIMON D.C. BAR #447956 ROBERT A. CAPLEN D.C. Bar #501480 Assistant United States Attorney Civil Division 555 4th 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,

## <u>/s/ William H. Narwold</u>

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

## CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2021, 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.

> <u>/s/ William H. Narwold</u> William H. Narwold