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 September 17, 2021, the parties file this joint status report to update the Court on their settlement discussions. On September 15, 2021, the parties submitted a joint status report informing the Court that they had made progress in their settlement discussions, but needed additional time to attempt to address a number of outstanding issues. Since then, the parties have continued to work diligently and have reached an agreement in principle on proposed terms to resolve the matter, subject to Defendant obtaining approval of the proposed terms of settlement from the United States Department of Justice. The parties also require time to memorialize the proposed terms in a written settlement document in connection with that approval process. 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 January 20, 2022.

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

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Respectfully submitted,

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

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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 November 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