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, *Plaintiffe*

Plaintiffs,

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

v.

UNITED STATES OF AMERICA, *Defendant*.

JOINT STATUS REPORT

As ordered by this Court on January 21, 2022, 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 last status report, 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.

The parties now report that counsel for the parties have finalized a draft settlement document, and that counsel for defendant has now begun the process of obtaining formal approval of the proposed settlement 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

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they provide a further status report to the Court on or before May 17, 2022, and that the stay of

proceedings be extended to May 25, 2022.

Counsel for the parties are available by telephone or videoconference should the Court

have any questions.

Dated: April 1, 2022

Respectfully submitted,

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

BRIAN P. HUDAK Acting Chief, Civil Division

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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 April 1, 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.

> <u>/s/ Deepak Gupta</u> Deepak Gupta