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-cy-00745-PLF

v.

UNITED STATES OF AMERICA, *Defendant*.

JOINT STATUS REPORT

Pursuant to the Court's order dated May 18, 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 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 April 1, 2022 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.

The defendant now reports that, on June 29, 2022, undersigned counsel for defendant received notice that the proposed settlement has been approved by the Associate Attorney General, which was the final stage of the review process. As the parties require time to confer over next steps, they respectfully propose that they provide a further status report to the Court on or before August 12, 2022, and that the stay of proceedings be extended to August 26, 2022.

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

Dated: June 30, 2022

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

BRIAN P. HUDAK Chief, Civil Division

By: /s/ 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

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Respectfully submitted,

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