

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

DOUG OMMEN, in his capacity as)	
Liquidator of CoOpportunity Health, Inc., and)	
DAN WATKINS, in his capacity as Special)	
Deputy Liquidator of CoOpportunity Health,)	
Inc.,)	
)	
Plaintiffs,)	
)	Case No.: 1:17-cv-957C
v.)	Judge Charles F. Lettow
)	
THE UNITED STATES OF AMERICA,)	
)	
<u>Defendant.</u>)	

**JOINT MOTION FOR AN ENLARGEMENT OF TIME
TO FILE JOINT STATUS REPORT**

On September 5, 2017, the Court stayed this case pending the Federal Circuit’s decisions in *Land of Lincoln Mutual Health Insurance Company v. United States*, No. 17-1224, and *Moda Health Plan, Inc. v. United States*, No. 17-1994. Dkt. 12. The Court required the parties to submit a status report no later than 10 business days following the *Land of Lincoln* and *Moda* decisions. Dkt. 12. On June 14, 2018, the Federal Circuit decided *Land of Lincoln* and *Moda*. No. 17-1224, Dkt. 166-1; No. 17-1994, Dkt. 87-1. Because the parties concur that additional time is necessary to adequately confer about next steps in this case, the parties jointly move to extend the time for the joint report by 14 days, to July 11, 2018.

In light of the amount of money at stake, and the complexity of the issues involved (including claims arising from other Affordable Care Act programs), the parties need additional time to confer about next steps in this case and the most efficient resolution of the claims at issue. Counsel for both parties are also traveling out of the office during this time, and this additional time will allow the parties to confer in greater detail about the next steps in this matter.

For these reasons, the parties respectfully request that the Court enlarge the time for the parties to file a joint status report by 14 days to July 11, 2018.

Dated: June 28, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 28, 2018, I electronically filed the foregoing JOINT MOTION FOR AN ENLARGEMENT OF TIME TO FILE JOINT STATUS REPORT with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

/s/ Frances M. McLaughlin

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