

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

ANDREA YOUNG, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. 1:19-cv-03526 (JEB)
	)	
ALEX M. AZAR II, et al.,	)	
	)	
Defendants.	)	
_____	)	

**JOINT MOTION REGARDING PROPOSED BRIEFING SCHEDULE**

Plaintiffs in this action, a putative class of Michigan Medicaid beneficiaries, assert claims under the APA, 5 U.S.C. § 706, and Take Care Clause of the U.S. Constitution, Art. II, § 3, cl. 5, seeking declaratory and injunctive relief pertaining to actions taken by federal government officials pursuant to Section 1115 of the Social Security Act, 42 U.S.C. § 1315. In particular, Plaintiffs challenge the Secretary of Health and Human Services’: (1) issuance of a letter to State Medicaid Directors concerning states’ imposition of work and community-engagement requirements on Medicaid recipients and (2) decision to approve Michigan’s proposed Section 1115 project known as “Healthy Michigan.” The work and community-engagement component of Healthy Michigan is in effect, with any terminations in coverage beginning on May 1, 2020.

The parties have conferred and respectfully move this Court to enter the following schedule:

- January 24, 2020** Government produces the administrative record
- February 13, 2020** Plaintiffs’ Motion for Preliminary Injunction and/or Motion for Summary Judgment
- March 4, 2020** Government’s Opposition to Plaintiffs’ Motion(s) and Government’s Motion to Dismiss and/or Motion for Summary Judgment

**March 17, 2020** Plaintiffs' Opposition to Government's Motion(s) and Plaintiffs' Reply in Support of Their Motion(s)

**March 30, 2020** Government's Reply in Support of its Motion(s).

The parties agree to stay the Government's obligation to Answer the Complaint until resolution of these motions.

December 30, 2019

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that December 30, 2019, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send an electronic notice to counsel for Defendants listed below:

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By: /s/ Martha Jane Perkins  
MARTHA JANE PERKINS

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_____	)	

**[PROPOSED] ORDER GRANTING JOINT MOTION  
REGARDING PROPOSED BRIEFING SCHEDULE**

This matter is before the Court on the Parties joint stipulation regarding a proposed briefing schedule. ECF No. \_\_. Having reviewed the joint motion, the Court hereby GRANTS the motion.

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_  
HON. JAMES E. BOASBERG  
UNITED STATES DISTRICT JUDGE