

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

MOLINA HEALTHCARE OF CALIFORNIA, )	
INC., <i>et al.</i> , )	
Plaintiffs, )	
v. )	No. 17-97C
THE UNITED STATES OF AMERICA, )	Judge Wheeler
Defendant. )	
_____ )	

**JOINT STATUS REPORT**

Pursuant to the Court’s August 4, 2017 Order (Doc. No. 25 at 48), the parties respectfully submit this joint status report to address the Plaintiffs’ final damages amount and to propose steps for further resolution of this case.

The Parties have conferred and agree and stipulate as follows:

First, with respect to Molina’s final damages under Counts I and III, the total amount of risk corridors payments owed to Molina for benefit years 2014 and 2015 is \$52,378,111.20. The parties stipulate that, as of the date of this joint status report, the Centers for Medicare & Medicaid Services has made \$6,195.40 in risk corridors payments to Molina (including a payment of \$170.76 in the August 2017 payment cycle). Under the Court’s August 4, 2017 Opinion, the unpaid balance of \$52,371,915.80 represents Molina’s final damages under Counts I and III.

Second, to preserve the status quo and both parties’ rights with respect to Plaintiffs’ remaining claim in Count IV and potential claims for benefit year 2016, the parties agree and jointly request that no Rule 54(b) judgment be entered at this time, and that all further proceedings in this case be stayed until after the Federal Circuit has finally decided the pending *Land of Lincoln* and *Moda* combined appeals. The parties shall file a joint status report 14 days

after the Federal Circuit has issued its final decision in these combined appeals.

Dated: August 25, 2017

/s/ Lawrence S. Sher  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 25, 2017, a copy of the foregoing Joint Status Report was filed electronically with the Court's Electronic Case Filing (ECF) system. I understand that notice of this filing will be sent to all parties by operation of the Court's ECF system.

s/ Lawrence S. Sher \_\_\_\_\_

Lawrence S. Sher

*Counsel for Plaintiffs*