

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

HEALTH REPUBLIC INSURANCE  
COMPANY,

Plaintiff,  
on behalf of itself and all others  
similarly situated,

vs.

THE UNITED STATES OF AMERICA,

Defendant.

No. 1:16-cv-00259-MMS  
(Judge Sweeney)

**JOINT STATUS REPORT**

Pursuant to the Court’s July 13, 2020 order (Dkt. 79), Plaintiff Health Republic Insurance Company and Defendant United States of America submit this joint status report. As stated in the July 10, 2020 joint status report (Dkt. 78), the Parties disagree about whether the United States is entitled to recover Affordable Care Act (“ACA”)-related debts owed by four members of the class (the “Dispute Subclass”).<sup>1</sup> In order to raise this issue for the Court’s consideration, the United States intends to file, within 10 days, a motion for leave to amend its answer to the complaint to assert counterclaims for the ACA-related debts against the Dispute Subclass. The Dispute Subclass opposes the United States’ request and will file an opposition within 10 days following the United States’ motion. The United States may file a reply within 7 days after the opposition.

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<sup>1</sup> The four class members are Colorado Health Insurance Cooperative, Inc. (HIOS ID 20472), Freelancers CO-OP of New Jersey, Inc. (HIOS ID 10191), Meritus Health Partners (HIOS ID 60761), and Meritus Mutual Health Partners (HIOS ID 92045).

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