

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

COMMON GROUND HEALTHCARE  
COOPERATIVE,

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

vs.

THE UNITED STATES OF AMERICA,

Defendant.

No. 1:17-cv-00877-MMS  
(Judge Sweeney)

**JOINT STATUS REPORT**

Pursuant to the Court’s October 13, 2020 order (Dkt. 123), the Dispute Subclass (consisting of Freelancers Co-Op of New Jersey (“Freelancers”)) and the United States submit this joint status report. Freelancers and the United States continue to work to finalize language of an agreed stipulation to judgment. Once the parties finalize an agreed stipulation, Freelancers, which is in liquidation, will submit the agreed stipulation to the court overseeing its liquidation for approval. The Parties request that the Court enter an order requiring the Parties to submit either a stipulation to judgment or a joint status report in 28 days.

DATED: November 6, 2020

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

/s/ Stephen Swedlow

Stephen Swedlow  
stephenswedlow@quinnemanuel.com  
191 N. Wacker Drive, Suite 2700  
Chicago, Illinois 60606  
Telephone: (312) 705-7400  
Facsimile: (312) 705-7401

J.D. Horton

jdhorton@quinnemanuel.com  
Adam B. Wolfson  
adamwolfson@quinnemanuel.com  
865 S. Figueroa Street  
Los Angeles, California 90017  
Telephone: (213) 443-3000  
Facsimile: (213) 443-3100

Attorneys for Plaintiff Common Ground  
Healthcare Cooperative and the Class

Respectfully submitted,

JEFFREY BOSSERT CLARK  
Acting Assistant Attorney General

ROBERT E. KIRSCHMAN, JR.  
Director

/s/ Claudia Burke  
CLAUDIA BURKE  
Assistant Director

/s/ Christopher J. Carney  
CHRISTOPHER J. CARNEY  
Senior Litigation Counsel  
Commercial Litigation Branch  
Civil Division  
U.S. Department of Justice  
P.O. Box 480  
Ben Franklin Station  
Washington, DC 20044  
Telephone: (202) 305-7597  
Facsimile: (202) 307-2503  
Email: Chris.Carney@usdoj.gov

OF COUNSEL:

MARC S. SACKS  
Assistant Director

ERIC E. LAUFGRABEN  
Senior Trial Counsel

ALBERT S. IAROSI  
Trial Attorney  
U.S. Department of Justice

Attorneys for Defendant United States of  
America