

have engaged Government counsel in initial talks regarding potential avenues for resolving the CSR matters.

The parties' resolution efforts are continuing at this time, and the parties jointly request that this Court continue the stay for 45 days from the date of its order. At present, plaintiffs' counsel are continuing efforts to develop a proposal to share with the Government to collectively resolve the damages and mitigation issues in the CSR cases without further litigation or to streamline resolution of these cases. Plaintiffs' counsel expects to share a proposal and methodology to resolve the damages and mitigation issues in these cases with the Government within 45 days. Thereafter, the Government's counsel must consult with and obtain approval from its decision makers and stakeholders and will provide a substantive response to Plaintiffs' counsel's proposal and methodology.

Good cause exists for the Court to continue the stay of this case. The parties are working together to determine whether they may efficiently resolve this matter without further litigation or can at least streamline the cases. The complexity of the CSR cases and the number of interested stakeholders, necessitates that the parties be afforded additional time for these efforts. The parties therefore jointly request that this Court continue the stay for 45 days from the date of its order to allow additional time to resolve some or all of the pending claims without further litigation on the measure of damages.

Dated: September 17, 2021

s/ Lawrence S. Sher
Lawrence S. Sher
REED SMITH LLP
1301 K Street, NW, Suite 1000
Washington, D.C. 20005
Tel: (202) 414-9200
Fax: (202) 414-9299
lsher@reedsmith.com

*Attorney for Plaintiff-Appellee Local Initiative
Health Authority for Los Angeles County, dba
L.A. Care Health Plan*

s/ Alisa B. Klein

Alisa B. Klein
Mark B. Stern

*Attorneys, Appellate Staff Civil Division,
Room 7235
U.S. Department of Justice
950 Pennsylvania Avenue NW Washington,
DC 20530
(202) 514-1597
Alisa.klein@usdoj.gov*

CERTIFICATE OF COMPLIANCE

The undersigned hereby certifies that this Joint Motion complies with the word limit of Fed. R. App. P. 27(d)(2)(A) because, excluding the parts of the document exempted by Fed. R. App. P. 32(f), it contains 373 words.

s/ Lawrence S. Sher _____

Lawrence S. Sher

REED SMITH LLP

1301 K Street, NW, Suite 1000

Washington, D.C. 20005

Tel: (202) 414-9200

Fax: (202) 414-9299

lsher@reedsmith.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 17, 2021, I caused the foregoing Joint Motion to be filed with the Clerk for the Court for the United States Court of Appeals for the Federal Circuit by using the appellate CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

s/ Lawrence S. Sher
Lawrence S. Sher
REED SMITH LLP
1301 K Street, NW, Suite 1000
Washington, D.C. 20005
Tel: (202) 414-9200
Fax: (202) 414-9299
lsher@reedsmith.com