

The parties' resolution efforts are progressing, and the parties respectfully request that the stay of this matter continue for an additional 60 days, at which time the parties will file a joint status report. Good cause exists for the Court to continue the existing stay of this case. On December 3, 2021, Plaintiffs' counsel shared a proposal with the Government to attempt to collectively resolve the damages and mitigation issues in the CSR cases without further litigation or to significantly streamline resolution of the remaining damages/mitigation issues in these cases. The complexity of the CSR cases and the large number of interested stakeholders necessitates that the parties be afforded additional time to complete these efforts. The Government is reviewing the proposal and consulting with the client agency and its actuaries. The Government hopes to provide Plaintiffs with a substantive response soon.

The parties therefore jointly propose that they file a status report by May 3, 2022, in which the parties will update the Court on the status of their efforts to resolve this matter.

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