

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

BLUE CROSS OF CALIFORNIA, *et al.*,

Plaintiffs,

v.

THE UNITED STATES,

Defendant.

No. 20-606 C
Judge Bonilla

JOINT STATUS REPORT

Pursuant to the Court's March 10, 2022 order (ECF No. 27), the parties respectfully submit this joint status report to request that the Court continue the stay in these proceedings.

This case is currently stayed because the Government is working with a number of CSR plaintiffs to determine whether they may efficiently resolve this matter without further litigation or at least streamline these cases. The parties to a number of these CSR cases, including this one, have also presented joint stipulations for entry of partial final judgment as to the CSR amounts owed by the Government for 2017. On March 10, 2022, the Court ordered the parties to file a joint status report on or before May 11, 2022.

The parties believe that the current continued stay in this case will provide more time for the broader discussions about possible approaches to resolving this and other CSR cases. On April 28, 2022, the Government provided its substantive response to the CSR Plaintiffs' proposed settlement methodology for CSR damages owed for benefit years 2018 and beyond. The parties held a conference call on May 6 to discuss certain aspects of the Government's response and what the next steps should be. The parties

intend to meet again soon to discuss more specific actuarial issues. After CSR Plaintiffs have completed reviewing the Government's response, the parties plan to meet and confer regarding the Government's response and the potential mutual resolution of pending CSR claims for benefit years 2018 and beyond. The complexity of the CSR cases and the number of interested stakeholders necessitate that the parties be afforded additional time to pursue this mutual attempt to resolve the damages issues in this case without further litigation. Good cause therefore exists to continue the stay in this case for CSRs due to Plaintiffs for benefit years 2018 and beyond.

Accordingly, the parties jointly request that the Court continue the stay in this case and the parties will file a Joint Status Report within 30 days to update the Court on the status of their efforts to fully resolve this matter.

May 11, 2022

Respectfully submitted,

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