

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

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HARVARD PILGRIM HEALTH CARE, INC.,)	
HPHC INSURANCE COMPANY, INC., AND)	
HARVARD PILGRIM HEALTH CARE OF)	
NEW ENGLAND, INC.,)	
)	Case No. 18-1820
Plaintiffs,)	
)	Judge Loren Smith
v.)	
)	
THE UNITED STATES,)	
)	
Defendant.)	
_____)	

JOINT STATUS REPORT

Pursuant to the Court’s Status Report Order of March 7, 2022 (ECF No. 38), the parties respectfully submit this Joint Status Report.

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. Specifically, on January 21, 2022, the parties filed a Joint Stipulation for Entry of Partial Final Judgment (ECF No. 33) to resolve damages owed through December 31, 2017. On January 31, 2022, the Court granted the Stipulation and directed the Clerk to enter partial final judgment (ECF No. 34).

The parties request that the Court continue the stay in this case until June 6, 2022 to provide more time for the broader discussions about possible approaches to resolving this and other CSR cases. 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. CSR Plaintiffs are reviewing the Government's response, after which 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 until June 6, 2022, at which time the parties will file a Joint Status Report to update the Court on the status of their efforts to fully resolve this matter.

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Respectfully submitted,

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