

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

MOLINA HEALTHCARE OF
CALIFORNIA, INC., *et al.*,

Plaintiffs,

v.

THE UNITED STATES,

Defendant.

No. 18-333
Judge Meyers

JOINT STATUS REPORT

Pursuant to the Court's March 4, 2022 order (ECF No. 34), 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. On March 4, 2022, the Court ordered the parties to file a joint status report on or before May 9, 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. 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 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 9, 2022

Respectfully submitted,

/s/ Lawrence S. Sher

Lawrence S. Sher (D.C. Bar No. 430469)
REED SMITH LLP
1301 K Street NW
Suite 1000-East Tower
Washington, DC 20005
Telephone: 202.414.9200
Facsimile: 202.414.9299
Email: lsher@reedsmith.com

Of Counsel:

Gregory Vose (PA Bar No. 324912)
REED SMITH LLP
Reed Smith Centre
225 Fifth Avenue, Suite 1200
Pittsburgh, PA 15222
Telephone: 412.288.3131
Facsimile: 412.288.3063
Email: gvose@reedsmith.com

Attorneys for Plaintiffs

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney
General

PATRICIA M. McCARTHY.
Director

/s/ Claudia Burke
CLAUDIA BURKE
Assistant Director

/s/ David M. Kerr
DAVID M. KERR
Trial Attorney
Commercial Litigation Branch
Civil Division
U.S. Department of Justice
P.O. Box 480
Ben Franklin Station
Washington, DC 20044
Telephone: (202) 307-3390
Email: David.M.Kerr@usdoj.gov

OF COUNSEL:

ALBERT S. IAROSCI
Trial Attorney
Civil Division
U.S. Department of Justice

Attorneys for Defendant