

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

NATIONAL VETERANS LEGAL )  
 SERVICES PROGRAM, NATIONAL )  
 CONSUMER LAW CENTER, and )  
 ALLIANCE FOR JUSTICE, for themselves )  
 and all others similarly situated, )  
 )  
*Plaintiffs,* )  
 )  
 v. )  
 )  
 UNITED STATES OF AMERICA, )  
 )  
*Defendant.* )  
 )  
 )  
 )

Civil Action No. 16-745 (ESH)

JOINT STATUS REPORT PROPOSING A SCHEDULE  
TO GOVERN FURTHER PROCEEDINGS

As the Court ordered, (ECF 88 at 1), the parties have conferred regarding a plan for the remainder of this case, and believe that further proceedings are necessary to determine the amount of an illegal exaction, if any. They jointly request that the Court approve the following proposed schedule:

1. The parties shall complete fact discovery by **September 30, 2018**.
2. The parties shall complete expert discovery by **March 1, 2019**.
3. All motions for summary judgment, if any, shall be filed on **April 15, 2019**.

The parties also request that the Court hold a status conference following the close of expert discovery on March 1, 2019, and before the due date for summary-judgment motions on April 15, 2019 to determine the most efficient plan for further proceedings at that point, including whether a brief bench trial may be appropriate.

April 16, 2018

Respectfully submitted,

By: /s/ William H. Narwold

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For Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that on April 16, 2018, I authorized the electronic filing of this Joint Status Report Proposing a Schedule to Govern Further Proceedings through this Court's CM/ECF system. I understand that notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ William H. Narwold

William H. Narwold