

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,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	Civil Action No. 16-745 (ESH)
)	
UNITED STATES OF AMERICA,)	
)	
<i>Defendant.</i>)	
)	
)	

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

William H. Narwold (D.C. Bar No. 502352)
MOTLEY RICE LLC
One Corporate Center
20 Church Street, 17th Floor
Hartford, CT 06103
Phone: (860) 882-1681
Fax: (860) 882-1682
bnarwold@motleyrice.com

Deepak Gupta (D.C. Bar No. 495451)
Jonathan E. Taylor (D.C. Bar No. 1015713)
GUPTA WESSLER PLLC
1900 L Street, NW
Washington, D.C. 20036
Phone: (202) 888-1741
Fax: (202) 888-7792
deepak@guptawessler.com, jon@guptawessler.com

Elizabeth Smith (D.C. Bar No. 994263)
MOTLEY RICE LLC
401 9th Street, NW, Suite 1001
Washington, D.C. 20004
Phone: (202) 232-5504
Fax: (202) 232-5513

Meghan S.B. Oliver (D.C. Bar No. 493416)
MOTLEY RICE LLC
28 Bridgeside Blvd.
Mount Pleasant, SC 29464
Phone: (843) 216-9000
Fax: (843) 216-9450

For Plaintiffs.

JESSIE K. LIU (D.C. Bar No. 472845)
United States Attorney

DANIEL F. VAN HORN (D.C. Bar No. 924092)
Chief, Civil Division

By: /s/ Brian Field

BRIAN FIELD (D.C. Bar No. 985577)
W. MARK NEBEKER (D.C. Bar No. 396739)
Assistant United States Attorneys
555 4th Street, N.W.
Washington, D.C. 20530
(202) 252-2536
brian.field@usdoj.gov; mark.nebeker@usdoj.gov

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