

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

HEALTH REPUBLIC INSURANCE
COMPANY,

Plaintiff,
on behalf of itself and all others
similarly situated,

vs.

THE UNITED STATES OF AMERICA,

Defendant.

No. 1:16-cv-00259-MMS
(Judge Sweeney)

**JOINT MOTION REGARDING INTERIM CLASS COUNSEL AND CLASS
CERTIFICATION BRIEFING SCHEDULE**

Plaintiff Health Republic Insurance Company and Defendant United States of America
hereby stipulate and jointly move as follows:

WHEREAS, on October 5, 2016, Plaintiff filed a Motion to Appoint Quinn Emanuel Urquhart & Sullivan, LLP as Interim Class Counsel (“Interim Class Counsel Motion”) (Dkt. 15) and a Motion for Class Certification (Dkt. 16);

WHEREAS, Defendant’s responses to both motions are due on October 24, 2016;

WHEREAS, Defendant does not oppose Plaintiff’s Interim Class Counsel Motion;

WHEREAS, due to the procedural posture of this case and the complexity of the issues presented, Defendant seeks to extend the deadline to respond to Plaintiff’s Motion for Class Certification by 60 days to December 23, 2016;

WHEREAS, Plaintiff seeks to extend the deadline for its reply in support of its Motion for Class Certification to January 13, 2017.

THEREFORE, Plaintiff and Defendant stipulate and respectfully request that the Court enter the attached Proposed Order and (1) grant Plaintiff's Interim Class Counsel Motion; (2) extend Defendant's deadline to respond to the Motion for Class Certification to December 23, 2016; and (3) extend Plaintiff's deadline for its reply in support of its Motion for Class Certification to January 13, 2017.

DATED: October 24, 2016

Respectfully submitted,

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

s/ Stephen Wedlow

Stephen Wedlow
stephenswedlow@quinnemanuel.com
500 W. Madison Street, Suite 2450
Chicago, Illinois 60661-2510
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

J.D. Horton
jdhorton@quinnemanuel.com
Adam B. Wolfson
adamwolfson@quinnemanuel.com
865 S. Figueroa Street
Los Angeles, California 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Attorneys for Plaintiff Health Republic
Insurance Company and the Class

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DATED: October 24, 2016

Respectfully submitted,

BENJAMIN A. MIZER
Principal Deputy Assistant Attorney General
Civil Division

RUTH A. HARVEY
Director
Commercial Litigation Branch

KIRK T. MANHARDT
Deputy Director

s/ Charles E. Canter
CHARLES E. CANTER
TERRANCE A. MEBANE
SERENA M. ORLOFF
L. MISHA PREHEIM
U.S. Department of Justice
Civil Division
Commercial Litigation Branch
Phone (202) 616-2236
Fax (202) 307-0494
Charles.Canter@usdoj.gov

Attorneys for the United States of America

CERTIFICATE OF SERVICE

I certify that on October 24, 2016, a copy of the attached Joint Motion Regarding Interim Class Counsel and Class Certification Briefing Schedule was served via the Court's CM/ECF system on Defendant's counsel Charles Edward Canter. I further certify under RCFC App. E. § VI(20)(b) that I have obtained consent from Defendant's counsel to file this document on their behalf.

s/ Stephen Swedlow

Stephen Swedlow