

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

**LINDA A. LACEWELL, in her capacity as)
Liquidator of Health Republic Insurance)
of New York, Corp.,)
Plaintiff,)
v.)
THE UNITED STATES OF AMERICA,)
Defendant.)**

No. 17-1185C
Judge Victor J. Wolski

JOINT STATUS REPORT AND REQUEST TO CONTINUE STAY OF PROCEEDINGS

Pursuant to the Court's October 23, 2020 Order (Dkt. 28), the parties submit this Joint Status Report and respectfully request that the Court continue the stay of this action for 30 days and permit the parties to file a joint status report on December 15, 2020. The parties are continuing to engage in productive conversations to explore a potential resolution of this matter. The parties request an additional 30 days to evaluate their respective positions and determine whether a resolution is possible.

Dated: November 13, 2020

Respectfully submitted,

JEFFREY BOSSERT CLARK
Acting Assistant Attorney General

RUTH A. HARVEY
Director
Commercial Litigation Branch

KIRK T. MANHARDT
Deputy Director

/s/Marc S. Sacks

MARC S. SACKS
FRANCES M. MC LAUGHLIN
PHILLIP M. SELIGMAN
TERRANCE A. MEBANE
L. MISHA PREHEIM
Commercial Litigation Branch
Civil Division
United States Department of Justice
P.O. Box 875
Ben Franklin Station
Washington D.C. 20044
Tel (202) 307-1104
Fax (202) 514-9163
marcus.s.sacks@usdoj.gov

Attorneys for the United States of America

CLARICK GUERON REISBAUM LLP

/s/Nicole Gueron

NICOLE GUERON
GREGORY A. CLARICK
MELISSA C. HOLSINGER
220 Fifth Avenue, 14th Floor
New York, NY 10001
Tel (212) 633-4310
ngueron@cgr-law.com

*Attorneys for Plaintiff Linda A. Lacewell, in
her capacity as Liquidator of Health
Republic Insurance of New York, Corp.*