

Pursuant to the Court's December 2, 2022 Order, the parties respectfully submit this Joint Status Report. The December 2, 2022 Order continued the stay in these proceedings and directed the parties to file a joint status report proposing further proceedings by January 17, 2023.

The parties' resolution efforts are progressing. On December 3, 2021, Plaintiffs' counsel shared a proposal with the Government to attempt to collectively resolve the damages and

mitigation issues in the CSR cases without further litigation or to significantly streamline resolution of the remaining damages/mitigation issues in these cases. On April 28, 2022, the Government responded to Plaintiffs' proposal, and Plaintiffs responded on May 23, 2022. Thereafter, the parties have convened by phone multiple times, and the Government produced certain settlement-related data and other information to the plaintiffs on July 22, 2022. Most recently, the parties participated in a settlement-related call on September 1, 2022, and the CSR Plaintiffs followed that call with a letter to the Government on September 15, 2022. The Government responded to CSR Plaintiffs by letter dated November 10, 2022, and the CSR Plaintiffs' offered a counter-proposal via letter on January 10, 2023. The Government is currently reviewing that proposal.

The parties respectfully request that the stay of this matter continue for an additional 60 days, at which time the parties will file a joint status report. Good cause exists for the Court to continue the existing stay of this case. The parties are working together to determine whether they may efficiently resolve this matter without further litigation or can at least streamline the damages and mitigation issues in this case. The complexity of the CSR cases and the large number of interested stakeholders, necessitates that the parties be afforded additional time to complete these efforts. The parties therefore jointly propose that they file a status report by March 17, 2023, in which the parties will update the Court on the status of their efforts to resolve this matter.

January 17, 2023

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