

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ANDREA YOUNG, et al.,)	
)	
Plaintiffs,)	
)	No. 1:19-cv-03526-JEB
v.)	
)	
XAVIER BECERRA, et al.,)	
)	
Defendants.)	

**INTERVENOR’S UNOPPOSED MOTION TO EXTEND DEADLINE FOR
THE JOINT STATUS REPORT AND TO CONTINUE THE STAY OF PROCEEDINGS**

Intervenor Michigan Department of Health and Human Services (“MDHHS”) request that this Court extend the parties’ deadline to submit a joint status report to July 31, 2023 and continue the stay in this case to August 14, 2023. In support of this request, Intervenor state as follows:

1. On November 22, 2019, Plaintiffs filed the Complaint in this case, challenging the Federal Defendants’ approval of Michigan’s request to extend the Healthy Michigan Plan section 1115 Medicaid waiver project. ECF No. 1.
2. On February 20, 2020, the Court granted MDHHS’s Motion to Intervene. *See* Minute Order (Feb. 20, 2020).
3. On April 2, 2020, the Court granted Intervenor’s unopposed Motion to Stay this case. ECF No. 28. The Court further ordered that the case be stayed “until the earlier of (1) the end of the COVID-19 public health emergency declared under Section 319 of the Public Health Services Act; or (2) 45 days before the date when Michigan begins to implement the premiums that are conditions of continued Medicaid eligibility or the

healthy behavior requirements that are conditions of continued Medicaid eligibility.”
(Minute Order of April 2, 2020).

4. The public health emergency declared under Section 319 ended on May 11, 2023.
5. On May 12, 2023, the parties jointly moved to request that the Court continue the stay until July 15, 2023 and order the parties to submit a joint status report on June 30, 2023. ECF No. 30.
6. On May 15, 2023, the Court granted the parties’ joint motion, staying the case until July 15, 2023 and ordering the parties to file a joint status report by June 30, 2023. *See* Minute Order (May 15, 2023).
7. Over the last several months, the Michigan legislature has been considering legislation that, if enacted, would impact Plaintiffs’ claims. The legislation has now passed both the House and the Senate, and it is awaiting the Governor’s signature. Intervenor believes it would be helpful for the parties to have additional time to analyze that legislation and confer about its impact on this litigation.
8. Intervenor conferred with Plaintiffs and the Federal-Defendants prior to filing this motion. Plaintiffs’ counsel informed Intervenor’s counsel that Plaintiffs do not oppose this motion. Federal-Defendants’ counsel informed Intervenor’s counsel that the Federal-Defendants do not oppose this motion.

WHEREFORE, Intervenor requests that the Court extend the deadline for the parties to file the joint status report to July 31, 2023, and continue the stay until August 14, 2023.

June 29, 2023

Respectfully submitted,

/s/ Philip J. Peisch

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Counsel for Intervenor

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which shall send notifications of such filing to any CM/ECF participants.

June 29, 2023

/s/ Philip J. Peisch

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No. 1:19-cv-03526-JEB

[PROPOSED] ORDER

This case is stayed until August 14, 2023. The parties' deadline to submit a joint status to address next steps in the case is extended to July 31, 2023.

Judge James E. Boasberg