

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

MAINE COMMUNITY HEALTH OPTIONS,

Plaintiff,

V.

THE UNITED STATES,

Defendant.

Case No. 20-458  
(Judge Davis)

**JOINT MOTION TO EXTEND TIME TO FILE JOINT STATUS REPORT**

Pursuant to Rules 6 and 6.1 of the Rules of the United States Court of Federal Claims, the parties respectfully request that the Court extend until August 1, 2023 the deadline in which to file a joint status report. The Court's May 18, 2023 order currently requires the parties to file a status report by Wednesday, July 12, 2023. During the last status conference on January 23, 2023, the Court indicated that, if the parties were not able to report a resolution in their July 12, 2023 status report, the litigation should proceed expeditiously.

The parties in these cost-sharing reduction cases have continued to engage in substantive settlement discussions but have not yet reached a resolution. Heedful of the Court’s concerns expressed in January, the parties request a short extension of time to submit their status report. Counsel for the parties met in person on June 26, 2023, to discuss certain remaining offset and mitigation issues that are material to any potential settlement. At this meeting, the parties agreed to exchange additional information by the end of July. This additional information is critical to the parties’ ultimate position on whether this matter can be resolved without litigation. The parties request a short extension of time, until August 1, to provide counsel for the parties an opportunity to review materials that the parties expect to be exchanged as part of their settlement negotiation process and to provide input into the parties’ next status report. If the Court grants this motion, the parties expect to be in a position to report their progress in a way that is consistent with the Court’s January 23, 2023 concerns.

July 12, 2023

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