

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

MAINE COMMUNITY HEALTH OPTIONS,	)	
	)	
Plaintiff,	)	
	)	Case No. 20-458
v.	)	(Judge Davis)
	)	
THE UNITED STATES,	)	
	)	
Defendant.	)	
	)	

**JOINT STATUS REPORT**

Pursuant to the Court's August 28, 2023 order, the parties respectfully submit this joint status report. The August 28 order continued the stay in these proceedings and directed the parties to file a joint status report on or before September 8, 2023.

As stated in the parties' Joint Status Report dated August 25, 2023, counsel for the parties met in person on June 26, 2023, to discuss these remaining offset and mitigation issues and their impact on any potential settlement of the CSR cases. The parties exchanged additional information and met again on July 27, 2023, and August 4, 2023. On August 18, August 23, and August 29, the CSR Plaintiffs provided the Government with correspondence regarding certain outstanding settlement issues and proposed a revised settlement methodology incorporating the parties' recent discussions. The parties participated in another settlement negotiation call on August 25 regarding the CSR Plaintiffs' recent correspondence.

In a September 7 letter, the Government responded with a comprehensive account of the issues the parties, in principle, have been able to agree upon and where the Government stands on the remaining issues. This September 7 letter describes terms of a proposed settlement that counsel for the Government would be willing to recommend for approval to their superiors at the

Department of Justice and officials at the Department of Health and Human Services. Counsel for the CSR Plaintiffs, however, require time to review the Government's latest proposal, confer with their clients, and respond. Considering that the Government's proposal is comprehensive and has the potential to be a framework for a final agreement, once plaintiffs have the opportunity to review and consider the Government's letter, the parties hope to know whether (and which) plaintiffs are interested in pursuing settlement with the methodology that the parties have crafted. With the Court's permission, the parties will then update the Court with a joint status report no later than September 29, 2023.

September 8, 2023

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