

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

HEALTH REPUBLIC INSURANCE
COMPANY,

Plaintiff,
on behalf of itself and all others
similarly situated,

vs.

THE UNITED STATES OF AMERICA,

Defendant.

No. 1:16-cv-00259-MMS
(Judge Sweeney)

**JOINT MOTION REGARDING INTERIM CLASS COUNSEL AND CLASS
CERTIFICATION BRIEFING SCHEDULE**

Plaintiff Health Republic Insurance Company and Defendant United States of America hereby stipulate and jointly move as follows:

WHEREAS, on October 5, 2016, Plaintiff filed a Motion to Appoint Quinn Emanuel Urquhart & Sullivan, LLP as Interim Class Counsel (“Interim Class Counsel Motion”) (Dkt. 15) and a Motion for Class Certification (Dkt. 16);

WHEREAS, Defendant’s responses to both motions are due on October 24, 2016;

WHEREAS, Defendant does not oppose Plaintiff’s Interim Class Counsel Motion;

WHEREAS, due to the procedural posture of this case and the complexity of the issues presented, Defendant seeks to extend the deadline to respond to Plaintiff’s Motion for Class Certification by 60 days to December 23, 2016;

WHEREAS, Plaintiff seeks to extend the deadline for its reply in support of its Motion for Class Certification to January 13, 2017.

THEREFORE, Plaintiff and Defendant stipulate and respectfully request that the Court enter the attached Proposed Order and (1) grant Plaintiff's Interim Class Counsel Motion; (2) extend Defendant's deadline to respond to the Motion for Class Certification to December 23, 2016; and (3) extend Plaintiff's deadline for its reply in support of its Motion for Class Certification to January 13, 2017.

DATED: October 24, 2016

Respectfully submitted,

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s/ Stephen Swedlow
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Attorneys for Plaintiff Health Republic
Insurance Company and the Class

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DATED: October 24, 2016

Respectfully submitted,

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Principal Deputy Assistant Attorney General
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CERTIFICATE OF SERVICE

I certify that on October 24, 2016, a copy of the attached Joint Motion Regarding Interim Class Counsel and Class Certification Briefing Schedule was served via the Court's CM/ECF system on Defendant's counsel Charles Edward Canter. I further certify under RCFC App. E. § VI(20)(b) that I have obtained consent from Defendant's counsel to file this document on their behalf.

s/ Stephen Swedlow

Stephen Swedlow