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18 **UNITED STATES DISTRICT COURT**  
19 **CENTRAL DISTRICT OF CALIFORNIA**  
20 **SOUTHERN DIVISION**

21  
22 JANE DOE, *et al.*,

23 *Plaintiffs.*

24 v.

25 ROB BONTA, in his official capacity as  
26 Attorney General; *et al.*,

27 *Defendants.*  
28

No. 8:19-cv-02105 DOC (ADSx)

**REQUIRED JOINT STATUS  
REPORT IN RESPONSE TO  
ORDER ON CROSS MOTIONS  
FOR SUMMARY JUDGMENT**

Judge David O. Carter

Date: n/a  
Time: n/a  
Trial Date: n/a

1 The undersigned, by and through their attorneys of record, hereby submit the  
2 following joint status report:

3 On February 25, 2022, the parties filed cross motions for summary  
4 judgment. *See* ECF Nos. 128, 132; *see also Fresenius* docket, Case No. 8:19-cv-  
5 2130, ECF Nos. 152, 153. On June 16, 2022, the Court granted the parties’  
6 stipulated request to vacate the trial date and all pretrial deadlines pending  
7 resolution of those motions. *See* ECF No. 189. The Court also ordered the parties  
8 to meet and confer and, within fourteen (14) days of the Court’s order resolving  
9 those motions, submit a joint report containing the parties’ positions on a pretrial  
10 schedule for any remaining claims, and any other remaining deadlines. *See id.*

11 On January 9, 2024, the Court ruled on the parties’ cross motions for  
12 summary judgment (the “Summary Judgment Order”). *See* ECF No. 207.  
13 Pursuant to the Court’s June 16, 2022 order, the parties have now met and  
14 conferred. Based on those discussions, the parties share the understanding that the  
15 Court has not issued a final judgment (through the Summary Judgment Order or  
16 otherwise) that would trigger the parties’ deadlines to submit any notices of appeal  
17 or to file motions for attorney’s fees. *See, e.g.,* Fed. R. Civ. P. 58(a).

18 In addition, Defendants intend to file a limited motion for reconsideration of  
19 the Summary Judgment Order on or before January 23, 2024. Plaintiffs anticipate  
20 filing an opposition to that motion on or before February 6, 2024. The parties  
21 respectfully request that the Court enter an order requiring that, within twenty-one  
22 (21) days of the Court’s order resolving Defendants’ forthcoming motion for  
23 reconsideration, the parties submit a joint status report regarding their proposed  
24 resolution of any outstanding issues for consideration by the Court.

25 The parties have submitted an agreed-upon proposed order consistent with  
26 the Joint Status Report for the Court’s consideration.

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1 Dated: January 18, 2024

Respectfully submitted,

2 /s/ Eric A. Shumsky

/s/ Kelly P. Dunbar

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**ATTESTATION**

I, Kelly Dunbar, hereby attest that all other signatories listed above concur in this filing's content and have authorized me to make this filing.

Dated: January 18, 2024

/s/ Kelly Dunbar

Kelly Dunbar