

July 15, 2022

**VIA ECF**

The Honorable Rachel P. Kovner  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Campos v. Kijakazi*, Case No. 21-cv-05143 (RPK)(VMS)**

Dear Judge Kovner,

We write on behalf of Plaintiffs and Defendant (collectively, “the Parties”) in the above-referenced action to provide the Court with a joint status report pursuant to Your Honor’s Order dated June 20, 2022.

Since the last report, on July 12, Defendant provided Plaintiffs with a written response answering Plaintiffs’ questions about the Defendant’s counter proposal. The Parties continue to believe that pursuing further settlement discussions would be worthwhile and have agreed as follows:

- Plaintiffs will provide a counter proposal to Defendant no later than July 19;
- The Parties agree to schedule a call at a mutually-convenient time, including staff in the Agency’s Office of Program Law, to discuss settlement status on or before August 15, 2022, and Defendant will endeavor to respond to Plaintiffs’ counter proposal at least 48 hours in advance of that call to give Plaintiffs adequate time to consider the response.

In view of the above, we respectfully request that the Parties provide a further status report to the Court by August 15, 2022 to apprise the Court of the status of the ongoing settlement discussions, and that, pending that status update, the oral argument on the preliminary injunction motion continue to be adjourned *sine die*. If at the time of the joint status report the Parties believe that oral argument on the motion will be necessary, they can advise the Court about their availability.

We are happy to provide additional information to the Court, if helpful. The Parties thank the Court for its ongoing assistance in this matter.

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Respectfully submitted,

/s/ Carmela T. Romeo

Carmela T. Romeo