

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

BROCK STONE, *et al.*,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., *et al.*,

Defendants.

Civil Action No. 17-cv-2459 (GLR)

JOINT STATUS REPORT

The parties submit the following update on the status of the litigation. The parties have reached an agreement in principle to fully resolve this litigation, including the allocation of all costs and fees between the parties. The parties are currently in the process of drafting the necessary documents to implement their agreement and stipulate to dismissal of this case. The parties do not believe that any impediment exists which would prevent the finalization of their agreement. Defendants have already obtained approval and authorization within the government for the agreement in principle. However, the parties require additional time to complete relevant documents. Accordingly, the parties jointly request an extension of the present stay until August 26, 2021. The parties anticipate that on or before that date, they will finalize their agreement and stipulate to dismissal of this case.

Dated: July 29, 2021

David M. Zionts*
Carolyn F. Corwin*
Mark H. Lynch (Bar No. 12560)
Joshua Roselman*
Peter J. Komorowski (Bar No. 20034)
Jeffrey Huberman*
Rishi R. Gupta*
COVINGTON & BURLING LLP
One CityCenter
850 Tenth St. NW
Washington, DC 20001
Telephone: (202) 662-6000
Fax: (202) 778-5987
dzionts@cov.com
ccorwin@cov.com
mlynch@cov.com
jroselman@cov.com
pkomorowski@cov.com
jhuberman@cov.com
rrgupta@cov.com

Mitchell A. Kamin*
COVINGTON & BURLING LLP
1999 Avenue of the Stars, Suite 3500
Los Angeles, California 90067
Telephone: (424) 332-4800
Facsimile: (424) 332-4749
mkamin@cov.com

* *Admitted pro hac vice*

Respectfully submitted,

/s/ Jeffrey Huberman

Deborah A. Jeon (Bar No. 06905)
David Rocah (Bar No. 27315)
AMERICAN CIVIL LIBERTIES UNION FOUND
OF MARYLAND
3600 Clipper Mill Road, #350
Baltimore, MD 21211
Telephone: (410) 889-8555
Fax: (410) 366-7838
jeon@aclu-md.org
rocah@aclu-md.org

Joshua A. Block*
Chase B. Strangio*
James Esseks*
Leslie Cooper*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street, 18th Floor
New York, NY 10004
Telephone: 212-549-2627
Fax: 212-549-2650
jblock@aclu.org
cstrangio@aclu.org
jesseks@aclu.org
lcooper@aclu.org

Attorneys for Plaintiffs

