

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Adam Steele, Brittany Montrois, and)
Joseph Henchman, on behalf of)
themselves and all others similarly)
situated,)
Plaintiffs,)
)
v.)
)
United States of America,)
Defendant.)
_____)

Civil Action No.: 1:14-cv-01523-RCL

JOINT STATUS REPORT

The parties hereby submit this joint status report regarding the scheduling order and the discovery process:

1. On May 2, 2019, the Court entered a scheduling order, which, among other things, set a deadline of November 29, 2019 for the close of fact discovery. (*See* Dkt. 100.)
2. On October 31, 2019, the parties submitted a joint motion to modify the scheduling order. (*See* Dkt. 107.)
3. In that motion, the parties sought an initial extension of the close of fact discovery from November 29, 2019 until February 28, 2020.
4. The parties also sought to suspend the remainder of the schedule.
5. The parties sought an initial three-month extension to permit additional time to complete focused discovery and narrow the scope of any remaining fact discovery.

6. During the initial three-month period, the United States agreed to produce targeted information regarding the scope of activities performed in connection with the preparer tax identification number user fee (“PTIN” and “PTIN User Fee”), in order to attempt to narrow the scope of additional fact discovery.

7. Before the close of the three-month period, the parties agreed to submit a subsequent extension request once they determined the amount of time necessary to complete any agreed-upon, narrowed fact discovery.

8. The Court has not yet ruled on the joint motion.

9. During the last three months, the United States has produced: (1) some of the cost data for years at issue; (2) unredacted versions of relevant contracts, including nearly all modifications, with vendors who provided services to the Return Preparer Office (RPO); (3) general policy and procedure information related to the PTIN; and (4) a sample group of documents representing a cross-section of the various activities conducted by RPO and funded by the PTIN fee.

10. The parties have made progress towards narrowing the scope of additional fact discovery.

11. The parties have been negotiating, but have not yet agreed on, a schedule to complete the remaining fact discovery in this case.

12. The parties will submit an additional report by March 13, 2020 regarding a proposed schedule for the remainder of fact discovery.

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13. In the interim, the parties will continue exchanging information through the discovery process.

Dated: February 28, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

On February 28, 2020, I, Christopher J. Williamson, declare that I filed the foregoing Joint Status Report with the Clerk of Court using the Official Court Electronic Document Filing System, which served copies on all interested parties registered for electronic filing.

Dated: February 28, 2020

/s/ Christopher J. Williamson
CHRISTOPHER J. WILLIAMSON