UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS, MADELINE KRASNO, and RYAN HARTKOPF,

Plaintiffs,

v.

LAWRENCE A. TABAK, in his official capacity as Acting Director of the National Institutes of Health, and XAVIER BECERRA, in his official capacity as Secretary of the U.S. Department of Health and Human Services,

Defendants.

Civil Action No. 21-2380 (BAH)

JOINT STATUS REPORT

1. On January 25, 2022, the Court issued a Minute Order instructing "the parties to file, by February 11, 2022, their joint stipulation of fact and a joint status report proposing a schedule for further proceedings."
2. The parties have reached agreement on a joint stipulation, which is being filed simultaneously. The parties have agreed that both the stipulation and their forthcoming cross-motions for summary judgment will address the Plaintiffs' allegations relating to the National Institutes of Health (NIH). The parties were more readily able to reach an agreed-upon set of facts relating to the NIH, and believe that the Court's resolution of their cross-motions with respect to the NIH's actions may obviate the need for further litigation over the allegations relating to the Department of Health and Human Services.

3. In light of the stipulated facts and the agreement of the parties to proceed to summary judgment, the parties jointly propose the following schedule for further proceedings:

Plaintiffs' Motion for Summary Judgment:	April 1, 2022
Defendants' Opposition and Cross-Motion:	May 6, 2022
Plaintiffs' Reply and Opposition:	May 27, 2022
Defendants' Reply:	June 17, 2022

4. The parties request that the Court stay their obligations under Rules 16 and 26 of the Federal Rules of Civil Procedure, until 30 days after the resolution of their forthcoming dispositive motions. Because the parties have agreed to a stipulation of fact, they also request that the Court waive the requirement of providing separate statements of material fact pursuant to Local Rule 7(h).

Dated: February 11, 2022

Respectfully submitted,

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/s/ Kuntal Cholera

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