

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

DONALD D. MARTIN, JR., <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	No. 13-834C
)	(Judge Patricia Campbell-Smith)
)	
THE UNITED STATES,)	
)	
Defendant.)	

JOINT STATUS REPORT

Pursuant to the Court's order dated March 10, 2017, the parties respectfully submit this status report regarding the parties' efforts to calculate the amount of liquidated damages due each collective action member pursuant to the Court's prior decisions.

As previously reported, the parties met on August 21, 2018, during which the consultant presented the proposed damages calculation methodology to counsel for the plaintiffs. Counsel for plaintiffs requested follow-up information concerning the consultant's presentation, which counsel for defendant has and is providing. In addition, counsel for defendant is continuing to work with the agencies to obtain necessary payroll data as expeditiously as possible. Counsel for plaintiffs continues to work to provide defendant with the remaining requested identifying information for the plaintiffs whom defendant could not initially identify, so that defendant may then request and obtain the requisite payroll data from the cognizant agencies. In addition, counsel for plaintiffs is contacting certain plaintiffs whom the consultant has preliminarily determined are not due liquidated damages, in order to advise the plaintiffs of that determination and to obtain any additional information that the consultant should consider. Once the parties agree upon the methodology, and all outstanding data are collected, the consultant can then calculate the amount of liquidated damages that the plaintiffs may be due.

Pursuant to the Court's order, the parties will submit a joint status report on January 21, 2019, to further update the Court on the parties' damages calculation efforts.

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December 17, 2018

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