

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

_____)	
FAIRHOLME FUNDS, INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	No. 13-465C
)	(Judge Sweeney)
THE UNITED STATES,)	
)	
Defendant.)	
_____)	

JOINT MOTION FOR LEAVE TO FILE JOINT STATUS REPORT OUT OF TIME

The parties respectfully request that the Court grant this joint motion for leave to file the joint status report due on May 27, 2016 one day out of time. On May 20, 2016, the Court issued an order construing Defendant’s notice of apparent violation of the protective order effective in this case as a motion and denying it (Doc. 326). The Court also ordered the parties to file, no later than May 27, 2016, a joint status report advising whether the Court’s Order should remain unsealed. Due primarily to the press of other deadlines, the parties inadvertently neglected to file the joint status report on time. Accordingly, we respectfully request that the Court permit the parties to file the joint status report, which is attached, on May 31, 2016.

Date: May 31, 2016

BENJAMIN C. MIZER
Principal Deputy Assistant Attorney General

s/ Robert E. Kirschman, Jr.
ROBERT E. KIRSCHMAN, JR.
Director

s/ Kenneth M. Dintzer
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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served upon all counsel of record on this 31st day of May, 2016, via the Court's Electronic Case Filing system.

s/ Kenneth M. Dintzer
KENNETH M. DINTZER

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THE UNITED STATES,)	
)	
Defendant.)	
_____)	

**JOINT STATUS REPORT REGARDING
UNSEALING THE COURT’S ORDER OF MAY 20, 2016**

Pursuant to this Court’s Order of May 20, 2016 denying Defendant’s motion for apparent violation of protective order (Doc. 326), the parties hereby submit this joint status report to inform the Court that they believe the Order should be unsealed in its entirety.

Date: May 31, 2016

Respectfully submitted,

BENJAMIN C. MIZER
Principal Deputy Assistant Attorney General

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