

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

RALLS CORPORATION,

Plaintiff,

v.

**COMMITTEE ON FOREIGN INVESTMENT
IN THE UNITED STATES, *et al.*,**

Defendants.

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Case No. 1:12-cv-01513-ABJ

**JOINT STATUS REPORT AND
JOINT MOTION TO STAY LITIGATION DEADLINES**

The parties hereby submit a joint status report in compliance with this Court’s minute order of September 11, 2015. The parties also jointly request that this Court stay the obligation, which this Court has set in a prior order, for the Committee on Foreign Investment in the United States (“CFIUS”) to issue an updated recommendation to the President in this matter. In support of this motion, the parties jointly state as follows:

1. This Court previously entered an order instructing CFIUS to “issue an updated recommendation to the President” by May 13, 2015. Order at 2 (Mar. 13, 2015) (ECF No. 73). This Court has also, on five occasions, granted the parties’ joint motions for an extension of time for this deadline, to and including October 9, 2015. *See* Minute Order of September 11, 2015.

2. In its most recent minute order, this Court further directed the parties to file a status report with the Court by October 9, 2015, and scheduled a status conference for October 16, 2015, if this matter is not resolved by that date. *Id.*

3. The parties have executed a settlement agreement in this matter. The parties anticipate that, in light of the settlement agreement, they will soon stipulate to the dismissal of this

action.

4. The parties agree that, in light of the settlement, it is not necessary for CFIUS to issue a new recommendation to the President in this matter.

5. The parties respectfully suggest that a status conference would be unnecessary in this matter. Both parties, of course, stand ready to appear for such a conference if the Court so desires. If the Court wishes to hold a conference, the parties respectfully request that they be permitted to appear telephonically, in order to accommodate a conflict in the schedule of the plaintiff's counsel.

WHEREFORE, the parties respectfully request that the Court stay the obligation that this Court has set in a prior order for the Committee on Foreign Investment in the United States ("CFIUS") to issue an updated recommendation to the President in this matter.

Dated: October 9, 2015

Respectfully submitted,

/s/ Paul D. Clement
Paul D. Clement
Viet D. Dinh
George W. Hicks, Jr.
BANCROFT PLLC
1919 M Street, N.W., Suite 470
Washington, D.C. 20036
(202) 234-0090
pclement@bancroftpllc.com

Counsel for Plaintiff

BENJAMIN C. MIZER
Principal Deputy Assistant Attorney General

VINCENT H. COHEN, JR.
Acting United States Attorney

ANTHONY J. COPPOLINO
Deputy Branch Director

DIANE KELLEHER
Assistant Branch Director

/s/ Joel McElvain
JOEL McELVAIN
Assistant Branch Director
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Avenue, NW
Washington, D.C. 20530
(202) 514-2988
Joel.McElvain@usdoj.gov

Counsel for Defendants