

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CONSOLIDATED ACTION

Case No. 18-62758-CIV-DIMITROULEAS
(Consolidated cases)

IN RE: MARJORY STONEMAN DOUGLAS
HIGH SCHOOL SHOOTING FTCA LITIGATION

JOINT STATUS REPORT

The Parties file this Joint Status Report in accordance with the Court’s Order that the Parties either file the appropriate dismissal papers or show cause why those papers have not been filed no later than March 16, 2022. ECF No. 489. The Associate Attorney General approved the global settlement on March 1, 2022. All 40 of the Stipulations for Compromise Settlement and Release (“Stipulations”) now have been signed on behalf of the United States, and sent to the United States Department of Treasury for payment.

It is the United States’ position that all of the conditions required for dismissal with prejudice of the consolidated cases have been met. Plaintiffs, however, are reluctant to dismiss their cases until all settlement funds have been received. Accordingly, Plaintiffs request a 45-day extension to allow for the Treasury Department to issue payments.¹ As stated above, the position of the United States is that these cases are now ripe for dismissal, but the United States does not oppose Plaintiffs’ request for an extension. Under Plaintiffs’ proposal, Plaintiffs will dismiss their cases with prejudice upon receipt of the settlement proceeds, requesting that the Court retain jurisdiction solely to adjudicate the pending motion for common benefit fees [D.E.

¹ To date, the Department of Treasury has already issued payments in one of the cases, and the rest remain in process.

418], the joinder thereto [D.E. 420], any pending related motions [D.E. 455, 459], and any motions relating to the common benefit fees motion which may be filed in the future.

Dated: March 16, 2022

Respectfully submitted,

/s/ Paul David Stern
PAUL DAVID STERN
Trial Attorney, Torts Branch
Civil Division
**Attorneys for Defendant
United States of America**

By: /s/ Kristina M. Infante
Kristina M. Infante
FL Bar No: 112557
**Plaintiffs' Lead Counsel
PODHURST ORSECK P.A.**

/s/ Robert M. Stein
Robert M. Stein, Esq.
Florida Bar No. 93936
**RENNERT VOGEL MANDLER &
RODRIGUEZ, P.A.**
Miami Tower
100 S.E. Second Street, Suite 2900
Miami, Florida 33131

s/ Alex Arteaga-Gomez, Esq.
STUART Z. GROSSMAN, ESQ.
szg@grossmanroth.com
NEAL A. ROTH, ESQ.
nar@grossmanroth.com
ALEX ARTEAGA-GOMEZ, ESQ.
aag@grossmanroth.com
Grossman, Roth, Yaffa Cohen, P.A.
2525 Ponce de Leon Blvd., Suite 1150
Coral Gables, FL 33134

s/Jay Cohen, Esq.
JAY COHEN, ESQ.
jcohen@jaycohenlaw.com
Cohen, Blostein & Ayala, P.A.

100 SE 3rd Avenue, Suite 1100
Fort Lauderdale, FL 33394

s/Curtis B. Miner, Esq.

CURTIS B. MINER, ESQ.

curt@colson.com

Colson Hicks Eidson, P.A.

255 Alhambra Circle, Ste PH
Coral Gables, FL 33134

s/David W. Brill, Esq.

DAVID W. BRILL, ESQ.

david@brillrinaldi.com

JOSEPH J. RINALDI, JR.

joe@brillrinaldi.com

Brill & Rinaldi, The Law Firm

17150 Royal Palm Blvd., Suite 2
Weston, FL 33326-2333

s/Tracy Considine, Esq.

TRACY CONSIDINE, ESQ.

tconsidine@tcjaxlaw.com

TRACY CONSIDINE, P.A.

1 Sleiman Parkway, Ste 210
Jacksonville, FL 32216

s/Todd J. Michaels, Esq.

MICHAEL A. HAGGARD, ESQ.

mah@haggardlawfirm.com

TODD J. MICHAELS, ESQ.

tjm@haggardlawfirm.com

The Haggard Law Firm

330 Alhambra Circle
Coral Gables, FL 33134

s/Robert Kelley, Esq.

ROBERT W. KELLEY, ESQ.

rwk@kulaw.com

KIMBERLY WALD, ESQ.

klw@kulaw.com

Kelley Uustal

500 N. Federal Highway, Suite 200
Ft. Lauderdale, FL 33301

s/Michael A. Goldfarb, Esq.
MICHAEL A. GOLDFARB, ESQ.
michael@goldfarblaw.com
Goldfarb Law, P.A.
75 Valencia Avenue, Suite 100
Miami, FL 33134

s/Alan Goldfarb, Esq.
ALAN GOLDFARB, ESQ.
agoldfarb@goldfarbpa.com
Alan Goldfarb, P.A.
100 SE 2nd Street
Bank of America Tower Suite 4500
Miami, FL 33131

s/Michael A. Wasserman, Esq.
MICHAEL A. WASSERMAN, ESQ.
mwasserman@800goldlaw.com
Law Offices of Craig Goldenfarb
1800 S Australian Avenue, Suite 400
West Palm Beach, FL 33409-6450

s/John E. Leighton, Esq.
JOHN E. LEIGHTON, ESQ.
john@leightonlaw.com
Leighton Law, P.A.
1401 Brickell Avenue, Suite 900
Miami, FL 33131

s/Adam Balkan, Esq.
ADAM BALKAN, ESQ.
adam@balkanpatterson.com
Balkan & Patterson LLP
1877 S Federal Hwy Ste 100
Boca Raton, FL 33432-7466

s/Alex Arreaza, Esq.
ALEX ARREAZA, ESQ.
The Law Office of Alex Arreaza
320 W Oakland Park Blvd
Wilton Manors, FL 33311-1710