

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No. 08-80736-Civ-Marra/Matthewman**

JANE DOE #1 AND JANE DOE #2,

Petitioners,

■.

UNITED STATES OF AMERICA,

Respondent.

PARTIES' CONFIDENTIAL JOINT STATUS REPORT

The parties, by and through undersigned counsel, hereby file this joint status report on the state of settlement negotiations. In support thereof, the parties state:

1. On May 23, 2016, the parties appeared before the Hon. Dave Lee Brannon for a settlement conference (DE392). Progress was made towards settlement, and it was agreed that the parties would continue working on their own towards settlement and re-convene for a second settlement conference on June 28, 2016 (*id.*). In accordance with that schedule, U.S. Magistrate Judge Brannon ordered the parties to file a joint status report by noon on June 24, 2016 (DE393), which was later continued to noon on July 1, 2016 (DE395).

2. The parties have continued to discuss the matter and progress continues towards settlement.

3. In particular, the parties jointly report that counsel for Respondent has provided the following to counsel for Petitioners:

- (a) an amended settlement agreement;
- (b) a proposed letter from the U.S. Attorney to Jane Doe #1; and
- (c) a proposed stipulation for dismissal with proposed Order.

4. Petitioner's counsel conferred with his client on Tuesday, June 28, 2016, to determine whether the proposals are acceptable to her. Counsel believes that additional time is needed to explain those proposals. The parties are continuing to communicate towards resolution.

For Petitioners:

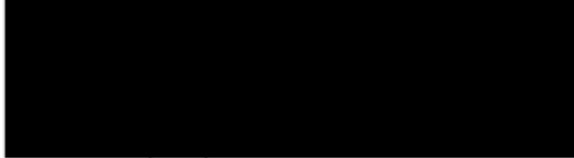
Respectfully submitted,

s/Bradley J. Edwards

Bradley J. Edwards

FARMER, JAFFE, WEISSING,

EDWARDS, FISTOS & LEHRMAN, P.C.



E-mail: brad@pathtojustice.com

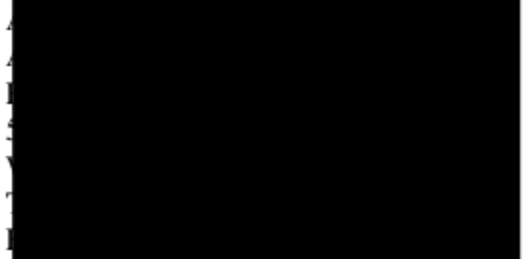
For Respondent:

Respectfully submitted,

WIFREDO A. FERRER

UNITED STATES ATTORNEY

By: s/ Marie C. Villafana



and marie.c.villafana@usdoj.gov

CERTIFICATE OF SERVICE

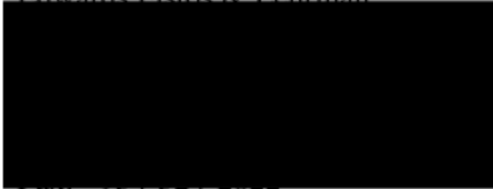
I HEREBY CERTIFY that on June 30, 2016, pursuant to the Court's Order, I emailed the foregoing document to U.S. Magistrate Judge Dave Lee Brannon and counsel for Petitioners.



SERVICE LIST

Jane Does 1 and 2 [REDACTED] United States,
Case No. 08-80736-CIV-MARRA/MATTHEWMAN
United States District Court, Southern District of Florida

Brad Edwards, Esq.,
Farmer Jaffe Weissing
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Paul G. Cassell



Attorneys for Jane Doe # 1 and Jane Doe # 2



Attorneys for Respondent United States of
America