

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

GOVERNMENT'S MOTION FOR ENTRY OF SCHEDULING ORDER

Pursuant to Appendix K of the Rules of the United States Court of Federal Claims, the defendant, the United States, respectfully motions the Court to propose a schedule that we believe will allow for the orderly management of this case. In accordance with RCFC 7.3, defendant's counsel of record certifies that the defendant attempted in good faith to confer with Mr. Forbes on this motion. Specifically, on November 20, 2025, through email, and on November 21, 2025, through telephone, defendant's counsel of record attempted to get Mr. Forbes' position on this motion. Counsel of record was unable to get Mr. Forbes' position. The United States respectfully proposes the following schedule that we believe will allow for orderly management of this case:

1. Defendant shall provide a copy of the proposed administrative record to plaintiff by December 5, 2025.
2. Defendant shall file the administrative record and regulatory appendix by December 12, 2025.
3. Plaintiff's motion for judgment upon the administrative record shall be filed by January 9, 2025.
4. Defendant's cross-motion for judgment upon the administrative record and response to plaintiff's motion shall be filed by January 30, 2025.

5. Plaintiff's reply in support of his motion for judgment upon the administrative record and response to defendant's cross-motion shall be filed by February 13, 2025.
6. Defendant's reply in support of its cross-motion for judgment upon the administrative record shall be filed by February 27, 2025.
7. Oral argument to be scheduled at the Court's convenience.

For the reasons stated above, we respectfully request that the Court enter the foregoing proposed schedule pursuant to Appendix K of the RCFC.

Respectfully submitted,

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Dated: November 21, 2025