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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 UNITED STATES OF AMERICA *ex rel.*
20 KATHY ORMSBY,

21 Plaintiff,

22 v.

23 SUTTER HEALTH and PALO ALTO
24 MEDICAL FOUNDATION,

25 Defendants.

) Case No. 3:15-cv-01062-LB

) **STIPULATION AND NOTICE OF**
) **SETTLEMENT; [~~PROPOSED~~] ORDER**

) Assigned Judge: Hon. Laurel Beeler

1 The parties hereby inform the Court that they have executed a settlement agreement (“SA”) and
2 a related corporate integrity agreement (“CIA”) to resolve all claims in the above matter. Thus, the
3 parties respectfully ask the Court to vacate all remaining deadlines in the case, including the case
4 management conference scheduled for September 16, 2021, at 9:30 a.m.

5 Pursuant to the SA, the parties continue to work to resolve the following issues: (i) Relator’s
6 right under 31 U.S.C. § 3730(d) to reasonable expenses, attorneys’ fees, and costs from the Defendants;
7 and (ii) Relator’s share of the proceeds of the settlement amount. The parties will notify the Court if
8 either issue requires further proceedings. Otherwise, once resolved, the parties will file a stipulation
9 dismissing the action in its entirety under Federal Rule of Civil Procedure 41(a)(1).

10 Respectfully submitted,

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12 STEPHANIE M. HINDS
Acting U.S. Attorney

13 Dated: August 30, 2021

14 By: /s/ Benjamin J. Wolinsky
Benjamin J. Wolinsky
Assistant U.S. Attorney

15 *Attorneys for the United States of America*

16
17 Dated: August 30, 2021

18 By: LATHAM & WATKINS LLP
/s/ Amy E. Hargreaves¹
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Amy E. Hargreaves

19
20 *Attorneys for Defendants Sutter Health and Palo
Alto Medical Foundation*

21
22 Dated: August 30, 2021

23 KELLER GROVER LLP
24 By: /s/ Kathleen R. Scanlan
Kathleen R. Scanlan

25 *Attorneys for Plaintiff-Relator Kathy Ormsby*

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27 ¹ In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty
28 of perjury that counsel for Defendants and counsel for Relator have concurred in the filing of this
document.

[PROPOSED] ORDER

Upon consideration of the parties' stipulation and notice of settlement, it is hereby ordered that:

1. All deadlines in this action are vacated; and
2. Once the parties resolve all remaining issues, they shall file a stipulation under Federal Rule of Civil Procedure 41(a)(1) to dismiss the action.

IT IS SO ORDERED.

Dated: August 30, 2021



HON. LAUREL BEELER
United States Magistrate Judge