

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
<i>ex rel.</i> Joanne Waters,	)	
	)	
Plaintiff,	)	No. 4:20-cv-00037-SEP
	)	
v.	)	
	)	
ST. LOUIS PATHOLOGY ASSOCIATES,	)	
INC., ST. LOUIS CLINICAL	)	
PATHOLOGY LLC, ST. JOHN’S MERCY	)	
HOSPITAL SYSTEM, PHYSICIAN	)	
DATA MANAGEMENT LLC, and	)	
UNITEDHEALTH GROUP, INC.,	)	
	)	
Defendants.	)	

**THE UNITED STATES’ CONSENT TO DISMISSAL  
AND RESPONSE TO COURT ORDER**

COMES NOW the United States of America (“United States”) and in response to this Court’s May 1, 2023 Order [Doc. 45] states as follows:

1. On January 9, 2020, Relator filed her *qui tam* Complaint under seal asserting claims under the False Claims Act. [Doc. 1].
2. On June 24, 2022, the United States filed a Notice of Election to Decline Intervention. [Doc. 29].
3. On August 2, 2022, the Court unsealed the Complaint. [Doc. 30].
4. On November 17, 2022, this Court granted Relator’s counsel’s request to withdraw as counsel and ordered Relator to obtain new counsel within ninety days. [Doc. 37].
5. Since November 17, 2022, this Court has granted Relator extensions of time to obtain counsel, but those extensions have now expired and no counsel has entered an appearance on Relator’s behalf.

6. Plaintiff may not pursue a claim *pro se* under the False Claims Act. *Joule Stevenson v. Mercy Clinic East Communities, No. 4:19CV973 RLW (E.D. Mo. 2020)*.

7. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice based on its determination that such a dismissal is commensurate with the law and the public interest and that the matter does not warrant the continued expenditure of government resources to pursue or monitor the action based on currently available information.

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

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**CERTIFICATE OF SERVICE**

A copy of the foregoing was mailed this 3<sup>rd</sup> day of May, 2023 to the following:

Joann Waters  
607 Sharon Dr.  
Johnson City, TN 37604

Pro Se Relator

/s/ Suzanne J. Moore