

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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|--|---|-------------------------------|
| United States ex rel. Dr. Susan Nedza, |) | |
| |) | |
| Plaintiff-Relator, |) | No. 15-cv-6937 |
| |) | |
| v. |) | Judge Jorge L. Alonso |
| |) | Magistrate Judge Susan E. Cox |
| American Imaging Management, Inc. |) | |
| |) | |
| Defendant. |) | |

JOINT STATUS REPORT

Plaintiff-Relator Dr. Susan Nedza and Defendant American Imaging Management, Inc. (“AIM”), jointly submit this status report.

I. Discovery and Pending Motions

A. No motions are pending.

B. Discovery is ongoing.

- i. The Parties have served and responded to written discovery consisting of requests for production, interrogatories, and requests for admission. The parties met and conferred on various issues raised by the written discovery, none of which has resulted in current motion practice.
- ii. Both parties have made rolling document productions, which will continue.
- iii. The Court entered an ESI protocol, and the parties continue to comply with its terms and confer in good faith about electronic discovery. The parties recently reached a compromise on custodians and search terms for the ESI search for Relator’s initial requests for production. AIM continues ESI collection, review, and production on a rolling basis.

- iv. As previously stated, discovery in this case will be extensive, including significant electronic discovery. The Parties anticipate, and have begun, seeking discovery from dozens of third parties, including CMS or other government agencies, which process typically is lengthy.
- v. The Parties continue to meet and confer on a number of topics related to discovery and will request an informal discovery conference if one is needed.
- vi. The close of fact discovery currently is December 20, 2021. (Dkt. 275).

II. Settlement

A. The Parties have not yet had settlement discussions, and at this time, the Parties do not request a settlement conference.

Dated: May 11, 2021

Respectfully Submitted:

Counsel for Defendant American Imaging Management, Inc.

Counsel for Relator

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