

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

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. The parties are currently engaged in motion practice regarding AIM’s Motion for Protective Order. Dkt. 285. The parties’ briefing is complete, and the Court has indicated that it will rule by mail. *See* Dkt. Nos. 285, 289, 290.

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. AIM continues ESI collection, review, and production on a rolling basis.

- iv. As previously stated, discovery in this case is extensive, including significant electronic discovery. The Parties anticipate, and have begun, seeking discovery from dozens of third parties, including CMS or other government agencies and Medicare Advantage insurance companies. AIM's pending motion for a protective order relates to discovery served on third parties.
- v. The Parties continue to meet and confer on a number of topics related to discovery including the temporal scope of discovery, privilege logs, and other topics. The Parties will request an informal discovery conference if one is needed.
- vi. The close of fact discovery currently is December 20, 2021. (Dkt. 275). The parties are discussing the schedule for this litigation in light of the status of document production, third-party discovery, and potential discovery disputes. The parties anticipate that a motion regarding the close of discovery may be filed in the next 30 days.

## II. Settlement

A. This week, Relator presented Defendant with a settlement demand. At this time, the Parties do not request a settlement conference.

Dated: August 12, 2021

*Respectfully Submitted:*

*Counsel for Defendant American Imaging Management, Inc.*

*Counsel for Relator*

/s/ Lisa Noller

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 12, 2021, I electronically filed the attached **JOINT STATUS REPORT** with the Clerk's Office using the CM/ECF system for filing, which will automatically send notice of such filing to the following CM/ECF Registrants:

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