

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. 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.
- ii. Plaintiff has made two productions totaling 4,133 pages of documents.
- iii. AIM has made six productions totaling 13,776 pages of documents. AIM’s most recent production was August 28, 2020. AIM’s document production continues on a rolling basis.
- iv. As previously stated, discovery in this case will be extensive, including significant electronic discovery covering such items as training materials, patient information and medical records, claims data, CMS billing information and contracts, and marketing information. The Parties

anticipate seeking discovery from several third parties, including CMS or other government agencies, which process typically is lengthy.

- v. The Parties continue to negotiate an Electronically Stored Information (“ESI”) protocol.
- vi. The Parties continue to meet and confer on a number of topics related to discovery and may request an informal discovery conference in the coming weeks.
- vii. The close of fact discovery currently is June 14, 2021. (Dkt. 249).

## II. Settlement

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

Dated: August 31, 2020

*Respectfully Submitted:*

*Counsel for Defendant American Imaging Management, Inc.*

*/s/ Lisa Noller*

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