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18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA  
20 SAN FRANCISCO DIVISION

21 UNITED STATES OF AMERICA ex rel.  
22 RONDA OSINEK,

23 Plaintiff,

24 v.

25 KAISER PERMANENTE, et al.,

26 Defendants.

) Case No. 3:13-cv-03891-EMC

) **STIPULATED REQUEST OF THE UNITED**  
) **STATES AND RELATORS OSINEK AND**  
) **TAYLOR FOR ORDER TO DEPOSIT FUNDS**  
) **IN COURT REGISTRY; [PROPOSED] ORDER**

27 (caption continued)

28 STIPULATED REQUEST FOR ORDER TO DEPOSIT FUNDS IN COURT REGISTRY  
No. 3:13-cv-03891-EMC et al.

1 UNITED STATES OF AMERICA ex rel.  
 2 JAMES M. TAYLOR,

3 Plaintiff,

4 v.

5 KAISER PERMANENTE, INC., et al.,

6 Defendants.

) Case No. 3:21-cv-03894-EMC

) **STIPULATED REQUEST OF THE UNITED**  
 ) **STATES AND RELATORS OSINEK AND**  
 ) **TAYLOR FOR ORDER TO DEPOSIT FUNDS**  
 ) **IN COURT REGISTRY; [PROPOSED] ORDER**

7 UNITED STATES OF AMERICA ex rel.  
 8 GLORYANNE BRYANT and VICTORIA  
 9 HERNANDEZ,

10 Plaintiffs,

11 v.

12 KAISER PERMANENTE, et al.,

13 Defendants.

) Case No. 3:18-cv-01347-EMC

) **STIPULATED REQUEST OF THE UNITED**  
 ) **STATES AND RELATORS OSINEK AND**  
 ) **TAYLOR FOR ORDER TO DEPOSIT FUNDS**  
 ) **IN COURT REGISTRY; [PROPOSED] ORDER**

14 Pursuant to the United States District Court, Northern District of California General Order No.  
 15 31 and Civil L.R. 7-12, the United States of America, Relator Ronda Osinek, and Relator James M.  
 16 Taylor (Relators Osinek and Taylor, collectively “Relators”) respectfully request that the Court issue an  
 17 order permitting the United States to deposit into the Court Registry the sum of \$44,666,450.41. That  
 18 sum will be deposited pending the final adjudication (and exhaustion of all appeal deadlines) of the  
 19 claim by Jeffrey Mazik, a relator in a separate action against Kaiser filed in the Eastern District of  
 20 California, to a share of the proceeds of the intervened federal False Claims Act (“FCA”) settlement  
 21 with Kaiser. The United States and Relators submit the following in support of this request:

22 1. On January 14, 2026, the United States, Relators, and Kaiser entered into a settlement  
 23 agreement pursuant to which Kaiser agreed to pay the United States \$556,000,000 (plus accrued  
 24 interest).

25 2. On January 15, 2026, the United States and Relators entered into an agreement (the  
 26 “Agreement”) pursuant to which the United States agreed to pay Relator Osinek \$95,398,219.18 of the  
 27 settlement proceeds (the “Relator Share”).

1 3. Following the execution of the Agreement on January 15, Mazik filed a “Notice of  
2 Related Action and Claim of Relator Jeffrey Mazik to Share of Settlement Proceeds under 31 U.S.C. §  
3 3730(c)(5).” Dkt. No. 422. Mazik is the relator in *United States et al. ex rel. Jeffrey Mazik v. Kaiser*  
4 *Permanente, Inc. et al.*, Case No. 2:19-cv-00559 (DAD) (JDP), pending in the Eastern District of  
5 California.

6 4. On February 25, 2026, Mazik filed a “Notice of Motion and Motion of Claimant Jeffrey  
7 Mazik for a Share of Settlement Proceeds under 31 U.S.C. § 3730(c)(5)” (the “Motion”). Dkt. No. 439.  
8 The Motion stated that Mazik was seeking “an award of 8% of the proceeds of the settlement”  
9 (\$44,666,450.41) which would be in addition to the amount set forth in the Agreement to pay Relator  
10 Osinek. *Id.* at \*8.

11 5. The United States and Relators filed responses in opposition to the Motion on March 11,  
12 2026. Dkt. Nos. 442 and 443. On April 10, the Court issued an order denying the Motion. Dkt.  
13 No. 461. On April 12, Mazik filed a “Notice of Appeal to the 9th Circuit Court of Appeals.” Dkt.  
14 No. 463. Mazik’s forthcoming appeal has yet to be filed or adjudicated.

15 6. The United States and Relators executed an amendment to the Agreement on May 4,  
16 2026 (the “Amendment”). Pursuant to the Amendment, the United States agreed to pay Relator Osinek  
17 \$50,731,768.77 of the Relator Share as soon as practicable and place \$44,666,450.41, the balance of the  
18 Relator Share, in the Court Registry of the United States District Court for the Northern District of  
19 California, pending final adjudication of Mazik’s claim.

20 7. Pursuant to the Amendment, if Mazik’s claim is resolved with no amount to be paid to  
21 Mazik, the United States and Relators agreed to file a stipulation to release the portion of the Relator  
22 Share held in the Court Registry to Relator Osinek through her counsel, with interest and minus any  
23 required fees.

24 8. Pursuant to the Amendment, if Mazik’s claim is resolved with some amount to be paid to  
25 Mazik, then Relators reserve their rights to move to enforce the Agreement and seek a court order that  
26 the Relator Share held in the Court Registry, with interest and minus any required fees, be released to  
27 Relator Osinek through her counsel, and the United States reserves its right to move to void the  
28

1 Agreement and seek to re-negotiate an appropriate share given multiple relators' competing claims to  
2 the government's recovery.

3 9. For the foregoing reasons, the United States requests that the Court enter an order  
4 allowing the United States to deposit promptly the sum of \$44,666,450.41 in the Court Registry.

5 DATED: May 7, 2026

Respectfully submitted,

6 BRETT A. SHUMATE  
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8 United States Attorney

9 /s/ Michelle Lo  
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Whistleblower Partners LLP

*Counsel for James M. Taylor*

\* In compliance with Civil Local Rule 5-1(i)(3), the filer attests that all signatories have concurred in the filing of this document.

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**[PROPOSED] ORDER**

The United States, Relator Ronda Osinek, and Relator James M. Taylor have entered into an agreement to deposit into the Court Registry the sum of \$44,666,450.41 pending the final adjudication (and exhaustion of all appeal deadlines) of a claim by Jeffrey Mazik, a relator in a separate action against Kaiser filed in the Eastern District of California, to a share of the proceeds of the intervened federal False Claims Act settlement with Kaiser in the above-captioned actions.

For the foregoing reason, the request by the United States, Relator Osinek, and Relator Taylor that the United States be permitted to deposit into the Court Registry the sum of \$44,666,450.41 is GRANTED.

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. EDWARD M. CHEN  
Senior U.S. District Judge