

1 Relators may have against Kaiser Permanente under 31 U.S.C. § 3730(d) for expenses, attorneys' fees,
2 and costs arising out of the investigation, filing, and litigation of Relators' *qui tam* complaints and the
3 United States' Amended Complaint-in-Intervention.

4 5. Consistent with the terms of the Settlement Agreement, the United States, Relators, and
5 Kaiser Permanente stipulate to the entry of an Order providing for the following:

- 6 a. The United States' Amended Complaint-in-Intervention (Dkt. No. 240) is dismissed with
7 prejudice, subject to the terms of the Settlement Agreement.
- 8 b. This Court retains jurisdiction over any dispute that may arise regarding compliance with
9 the terms of the Settlement Agreement or to the extent necessary to enforce the terms and
10 conditions of the Settlement Agreement.

11 The United States, Relators, and Kaiser Permanente respectfully request that the Court enter an
12 order of dismissal in the form attached.

13 IT IS SO STIPULATED.

14 DATED: January 14, 2026

Respectfully submitted,

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

~~PROPOSED~~ ORDER OF DISMISSAL

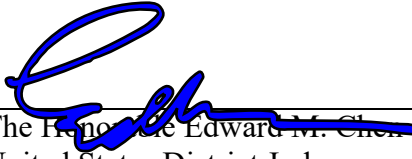
On consideration of the Joint Stipulation of Dismissal filed by the United States of America (“United States”), Relators Ronda Osinek and James M. Taylor, and Defendants Kaiser Foundation Health Plan, Inc., Kaiser Foundation Health Plan of Colorado, The Permanente Medical Group, Inc., Southern California Permanente Medical Group, and Colorado Permanente Medical Group, P.C. pursuant to Federal Rule of Civil Procedure 41(a) and the *qui tam* provisions of the False Claims Act, 31 U.S.C. § 3730(b)(1), and in accordance with the terms and conditions of a Settlement Agreement executed on or about January 14, 2026, it is hereby ORDERED that:

1. The United States’ Amended Complaint-in-Intervention (Dkt. No. 240) is dismissed with prejudice, subject to the terms of the Settlement Agreement.

2. This Court retains jurisdiction over any dispute that may arise regarding compliance with the terms of the Settlement Agreement or to the extent necessary to enforce the terms and conditions of the Settlement Agreement.

It is so ORDERED.

DATED: March 16, 2026


The Honorable Edward M. Chen
United States District Judge