

1 GOLDBERG KOHN LTD.
2 Roger A. Lewis (admitted *pro hac vice*)
3 roger.lewis@goldbergkohn.co
4 David E. Morrison (admitted *pro hac vice*)
5 david.morrison@goldbergkohn.com
6 W. Kyle Walther (admitted *pro hac vice*)
7 kyle.walther@goldbergkohn.com
8 55 East Monroe Street, Suite 3300
9 Chicago, IL 60603
10 Telephone: (312) 201-4000

11 SIEGEL, YEE, BRUNNER & MEHTA
12 Sonya Z. Mehta
13 SonyaMehta@siegelyee.com
14 475 14th Street, Suite 500
15 Oakland, CA 94612
16 Telephone: (415) 421-1800

17 *Attorneys for Relators*
18 *Gloryanne Bryant and Victoria Hernandez*

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

21 UNITED STATES OF AMERICA, *ex rel.*) Case No. 3:13-cv-03891-EMC
22 RONDA OSINEK,) (Consolidated)
23)
24 Plaintiffs,) **JOINT STIPULATION OF**
25) **DISMISSAL AND**
26 v.) ~~**PROPOSED**~~ **ORDER**
27)
28 KAISER PERMANENTE, *et al.*,)
Defendants.)

(CAPTION CONTINUED)

29 UNITED STATES OF AMERICA *ex rel.*) Case No. 3:18-cv-01347-EMC
30 GLORYANNE BRYANT and VICTORIA)
31 HERNANDEZ,) **JOINT STIPULATION OF**
32) **DISMISSAL AND ~~PROPOSED~~**
33 Plaintiffs,) **ORDER**
34)
35 v.)
36 KAISER PERMANENTE, *et al.*,)
37 Defendants.)

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

3 Plaintiff,

4 v.

5 KAISER PERMANENTE, et al.,

6 Defendants.
7

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

**JOINT STIPULATION OF
DISMISSAL AND ~~PROPOSED~~
ORDER**

8 Pursuant to Federal Rule of Civil Procedure 41(a) and the *qui tam* provisions of the False
9 Claims Act (FCA), 31 U.S.C. § 3730(b)(1), and in accordance with the terms and conditions of the
10 January 14, 2026 Agreement (the “Declined Claims Agreement”), Relators Gloryanne Bryant,
11 Victoria M. Hernandez, and James M. Taylor (each a “Relator” and, collectively, “Relators”) and
12 Defendants Kaiser Foundation Health Plan, Inc., Kaiser Foundation Health Plan of Colorado, The
13 Permanente Medical Group, Inc., Southern California Permanente Medical Group, and Colorado
14 Permanente Medical Group, P.C. (“Kaiser Permanente” or “Defendants”), by and through
15 undersigned counsel, stipulate and agree to the dismissal of Relators’ Claims against Kaiser
16 Permanente as follows:

17 1. The Relators and Defendants have executed the written Declined Claims
18 Agreement.

19 2. In the event of any inconsistency between this Order and the Declined Claims
20 Agreement, the terms and conditions of the Declined Claims Agreement shall control.

21 3. On October 22, 2014, Relator Taylor, filed a *qui tam* action in the United States
22 District Court for the District of Colorado captioned *United States ex rel. Taylor v. Kaiser*
23 *Permanente, et al.*, No. 1:14-cv-02889, pursuant to the *qui tam* provisions of the FCA, 31 U.S.C. §
24 3730(b) (the “Taylor Civil Action”). On November 3, 2014, Relator Taylor filed an amended
25 complaint. The Taylor Civil Action was transferred to the Northern District of California on May
26 11, 2021, Case No. 3:21-cv-03894-EMC, and consolidated with related cases on June 25, 2021.
27 The United States intervened in part and declined to intervene in part in the Taylor Civil Action on
28 July 27, 2021. The case was unsealed on July 28, 2021. Taylor filed a second amended complaint

1 on November 15, 2021, and a third amended complaint on December 12, 2022 (the “TAC”). On
2 June 15, 2023, the court dismissed certain claims in the TAC and allowed certain other claims to
3 proceed. (ECF No. 276).

4 4. On March 1, 2018, Relators Gloryanne Bryant and Victoria Hernandez filed a *qui*
5 *tam* action in the United States District Court for the Northern District of California captioned
6 *United States ex rel. Bryant v. Kaiser Permanente, et al.*, No. 3:18-cv-01347-EMC (N.D. Cal.),
7 pursuant to the *qui tam* provisions of the FCA, 31 U.S.C. § 3730(b) (the “*Bryant Hernandez Civil*
8 *Action*”). The United States intervened in part and declined to intervene in part in the *Bryant*
9 *Hernandez Civil Action* on July 27, 2021. The case was unsealed on July 28, 2021. Bryant and
10 Hernandez filed an amended complaint on November 15, 2021 (ECF No. 117) and a second
11 amended complaint on December 12, 2022 (ECF No. 238) (the “SAC”). On June 15, 2023, the
12 court dismissed certain claims in the SAC and allowed certain other claims to proceed. (ECF No.
13 277) (the *Taylor Civil Action* and the *Bryant Hernandez Civil Action* shall be collectively referred
14 to as the “Civil Actions”).

15 5. Pursuant to 31 U.S.C. § 3730(b)(1), the dismissal of the Civil Actions is subject to
16 the consent of the United States.

17 6. Relators stipulate that the Declined Claims Agreement is fair, adequate, and
18 reasonable under all the circumstances under 31 U.S.C. § 3730(c)(2)(B) and that any claims
19 Relators may have under 31 U.S.C. § 3730(d)(2) have been resolved.

20 7. Relators and Kaiser Permanente have reached agreement in full settlement of any
21 claims Relators may have against Kaiser Permanente under 31 U.S.C. § 3730(d) for expenses,
22 attorneys’ fees, and costs arising out of the investigation, filing, and litigation of Relators’ *qui tam*
23 complaints and the United States’ Amended Complaint-in-Intervention.

24 8. Relators and Defendants stipulate to the entry of an Order, subject to the consent of
25 the United States, providing for the following:

- 26 a. All claims against Kaiser Permanente are dismissed with prejudice as to
27 Relators.
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- b. All claims against Defendants for which the United States declined to intervene are dismissed without prejudice as to the United States.
- c. This Court retains jurisdiction over any dispute that may arise regarding compliance with the terms of the Declined Claims Agreement or to the extent necessary to enforce the terms and conditions of the Declined Claims Agreement.

The Relators and Kaiser Permanente respectfully request that the Court enter an order of dismissal in the form attached.

IT IS SO STIPULATED.

DATED: January 15, 2026

Respectfully submitted,

/s/ Roger A. Lewis

ROGER A. LEWIS
DAVID E. MORRISON
W. KYLE WALTHER
Goldberg Kohn Ltd.

SONYA Z. MEHTA
Siegel, Yee, Brunner & Mehta

*Attorneys for Relators Gloryanne Bryant
and Victoria M. Hernandez*

/s/ Max Voldman

MICHAEL RONICKHER
HAMSA MAHENDRANATHAN
MARY INMAN
HALLIE NOECKER
ELIZABETH SOLTAN
MAX VOLDMAN
Whistleblower Partners

Attorneys for Relator James M. Taylor

/s/ Jeannine S. Rhee

JEANNIE S. RHEE
MEREDITH R. DEARBORN

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

L. RUSH ATKINSON
LYLE W. GRUBY
Dunn Isaacson Rhee LLP

Attorneys for Defendants

* 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

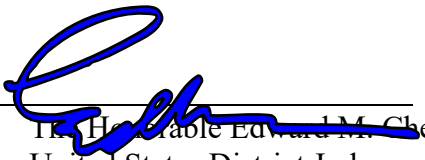
1
2 On consideration of the Joint Stipulation of Dismissal filed by Relators Gloryanne Bryant,
3 Victoria M. Hernandez, and James M. Taylor (each a “Relator” and, collectively, “Relators”) and
4 Defendants Kaiser Foundation Health Plan, Inc., Kaiser Foundation Health Plan of Colorado, The
5 Permanente Medical Group, Inc., Southern California Permanente Medical Group, and Colorado
6 Permanente Medical Group, P.C. (“Kaiser Permanente” or “Defendants”), pursuant to Federal Rule
7 of Civil Procedure 41(a) and the *qui tam* provisions of the False Claims Act, 31 U.S.C. § 3730(b)(1),
8 and in accordance with the terms and conditions of the Declined Claims Agreement executed on or
9 about January 14, 2026, and the consent of the United States, it is hereby ORDERED that:

10
11 1. All claims against Kaiser Permanente are dismissed with prejudice as to Relators
12 James Taylor, M.D., Gloryanne Bryant, and Victoria Hernandez.

13 2. All claims against Kaiser Permanente for which the United States declined to
14 intervene are dismissed without prejudice as to the United States.

15 3. This Court retains jurisdiction over any dispute that may arise regarding compliance
16 with the terms of the Declined Claims Agreement or to the extent necessary to enforce the terms
17 and conditions of the Declined Claims Agreement.

18 Dated: March 16, 2026



Honorable Edward M. Chen
United States District Judge