

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

7 SIEGEL, YEE, BRUNNER & MEHTA  
8 Sonya Z. Mehta  
SonyaMehta@siegelyee.com  
9 475 14<sup>th</sup> Street, Suite 500  
Oakland, CA 94612  
10 Telephone: (415) 421-1800

11 *Attorneys for Relators*  
12 *Gloryanne Bryant and Victoria Hernandez*

13 **UNITED STATES DISTRICT COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

15  
16 UNITED STATES OF AMERICA, *ex rel.* ) Case No. 3:13-cv-03891-EMC  
17 RONDA OSINEK, ) (Consolidated)  
18 )  
Plaintiffs, )  
19 )  
v. ) **JOINT STIPULATION OF**  
20 ) **DISMISSAL AND**  
KAISER PERMANENTE, *et al.*, ) **~~PROPOSED~~ ORDER**  
21 )  
Defendants. )  
22

23 \_\_\_\_\_  
24  
25  
26  
27  
28

1 UNITED STATES OF AMERICA ex rel.  
2 GLORYANNE BRYANT and VICTORIA  
3 HERNANDEZ,

4 Plaintiffs,

5 v.

6 KAISER PERMANENTE, et al.,

7 Defendants.

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

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

8 (CAPTION CONTINUED)

9 UNITED STATES OF AMERICA ex rel.  
10 JAMES M. TAYLOR,

11 Plaintiff,

12 v.

13 KAISER PERMANENTE, et al.,

14 Defendants.

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

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

15  
16 Pursuant to Federal Rule of Civil Procedure 41(a) and the *qui tam* provisions of the False  
17 Claims Act (FCA), 31 U.S.C. § 3730(b)(1), Relators Gloryanne Bryant and Victoria M. Hernandez  
18 (each a “Relator” and collectively, “Relators”) and Defendants Kaiser Foundation Health Plan of  
19 the Northwest, Kaiser Foundation Hospitals, and Northwest Permanente, P.C., (hereafter  
20 collectively referred to as the “Defendants”), by and through undersigned counsel, stipulate and  
21 agree to the dismissal of Relators’ Claims against Defendants as follows:

22 1. On March 1, 2018, Relators Gloryanne Bryant and Victoria Hernandez filed a *qui*  
23 *tam* action in the United States District Court for the Northern District of California captioned  
24 *United States ex rel. Bryant v. Kaiser Permanente, et al.*, No. 3:18-cv-01347-EMC (N.D. Cal.),  
25 pursuant to the *qui tam* provisions of the FCA, 31 U.S.C. § 3730(b) (the “Civil Action”). The United  
26 States intervened in part and declined to intervene in part in the Civil Action on July 27, 2021. The  
27 case was unsealed on July 28, 2021. Relators filed an amended complaint on November 15, 2021  
28 (ECF No. 117) and a second amended complaint on December 12, 2022 (ECF No. 238) (the “SAC”).

1 On June 15, 2023, the court dismissed certain claims in the SAC and allowed certain other claims  
2 to proceed. (ECF No. 277).

3 2. Pursuant to 31 U.S.C. § 3730(b)(1), the dismissal of the Civil Action is subject to the  
4 consent of the United States.

5 3. This stipulation is neither an admission of liability by Defendants nor a concession  
6 by Relators that their claims are not well founded.

7 4. The Relators agree not to sue Defendants for all claims Relators have asserted, could  
8 have asserted, or may assert in the future relating to the Civil Action, including claims under CA  
9 Civil Code § 1542. Defendants agree not to sue Relators for all claims Defendants have asserted,  
10 could have asserted, or may assert in the future specifically relating to the Civil Action and Relators'  
11 investigation and prosecution thereof, including claims under CA Civil Code § 1542.

12 5. Relators and Defendants stipulate to the entry of an Order, subject to the consent of  
13 the United States, providing for the following:

- 14 a. All claims against Defendants are dismissed with prejudice as to Relators.  
15 b. All claims against Defendants for which the United States declined to intervene  
16 are dismissed without prejudice as to the United States.

17 The Relators and Defendants respectfully request that the Court enter an order of dismissal  
18 in the form attached.

19  
20 IT IS SO STIPULATED.

21  
22 DATED: January 15, 2026

Respectfully submitted,

*/s/ Roger A. Lewis*

24 \_\_\_\_\_  
ROGER A. LEWIS  
25 DAVID E. MORRISON  
26 W. KYLE WALTHER  
Goldberg Kohn Ltd.

27 SONYA Z. MEHTA  
28 Siegel, Yee, Brunner & Mehta

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

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

/s/ Jeannine S. Rhee  
JEANNIE S. RHEE  
MEREDITH R. DEARBORN  
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.


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

~~PROPOSED~~ ORDER OF DISMISSAL

On consideration of the Joint Stipulation of Dismissal filed by Relators Gloryanne Bryant and Victoria M. Hernandez (each a “Relator” and collectively, “Relators”) and Defendants Kaiser Foundation Health Plan of the Northwest, Kaiser Foundation Hospitals, and Northwest Permanente, P.C. (“Defendants”) 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 the consent of the United States, it is hereby ORDERED that:

- a. All claims against Defendants are dismissed with prejudice as to Relators Gloryanne Bryant and Victoria Hernandez.
- b. All claims against Defendants for which the United States declined to intervene are dismissed without prejudice as to the United States.

Dated: March 16, 2026

  
\_\_\_\_\_  
The Honorable Edward M. Chen  
United States District Judge