

1 BRETT A. SHUMATE
Assistant Attorney General

2 CRAIG H. MISSAKIAN (CABN 125202)
3 United States Attorney

4 PAMELA T. JOHANN (CABN 145558)
Chief, Civil Division

5 MICHELLE LO (NYBN 4325163)
6 Assistant United States Attorney

7 450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
8 Telephone: (415) 436-7200
Facsimile: (415) 436-6748
9 Michelle.Lo@usdoj.gov

10 JAMIE ANN YAVELBERG
EDWARD C. CROOKE
11 BRADEN CIVINS
GARY R. DYAL
12 MICHAEL R. FISHMAN
MARTHA N. GLOVER
13 SETH W. GREENE
RACHEL C. KARPOFF
14 LAURIE A. OBEREMBT
JONATHAN T. THROPE
15 United States Department of Justice
Civil Division
16 Commercial Litigation Branch

17 *Counsel for the United States of America*

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
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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
Assistant Attorney General

7 CRAIG H. MISSAKIAN
8 United States Attorney

9 /s/ Michelle Lo
10 MICHELLE LO
Assistant United States Attorney

11 JAMIE ANN YAVELBERG
12 EDWARD C. CROOKE
13 BRADEN CIVINS
14 GARY R. DYAL
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16 MARTHA N. GLOVER
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18 RACHEL C. KARPOFF
19 LAURIE A. OBEREMBT
20 JONATHAN T. THROPE
21 United States Department of Justice
22 Civil Division
23 Commercial Litigation Branch

Counsel for the United States of America

24 /s/ Amy M. Zeman
25 AMY MARIE ZEMAN
26 ERIC H. GIBBS
27 DYLAN HUGHES
28 Gibbs Mura LLP

Counsel for Ronda Osinek

/s/ Max Voldman
MAX VOLDMAN
HAMSA MAHENDRANATHAN
HALLIE NOECKER
MICHAEL RONICKER
ELIZABETH SOLTAN
MAX VOLDMAN

Whistleblower Partners LLP

Counsel for James M. Taylor

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5 * In compliance with Civil Local Rule 5-1(i)(3), the filer attests that all signatories have
6 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: May 12, 2026



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