YAAKOV M. ROTH
Acting Assistant Attorney General
BILAL A. ESSAYLI
United States Attorney
DAVID M. HARRIS, AUSA
Chief, Civil Division
JACK D. ROSS, AUSA (CBN 265883)
Chief, Civil Fraud Section
Room 7516, Federal Building
300 N. Los Angeles Street
Los Angeles, California 90012
Tel: (213) 894-7395
Fax: (213) 894-7819
Email: Jack.Ross@usdoj.gov
JAMIE ANN YAVELBERG
COLIN M. HUNTLEY
BENJAMIN C. WEI
Attorneys, Civil Division
United States Department of Justice
P.O. Box 261, Ben Franklin Station
Washington, D.C. 20044
T: 202.616.2875| F: 202.616.3085
Email: Benjamin.C.Wei@usdoj.gov
Attorneys for the United States of America

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

UNITED STATES OF AMERICA *ex rel.* ASHWANI CHAWLA, Plaintiffs, v. UNIFIED CARE SERVICES, LLC, *et al.*, Defendants.	No. LACV 21-5935 GW (RAOx) JOINT STIPULATION OF DISMISSAL OF DEFENDANTS; CONSENT OF THE UNITED STATES TO DISMISSAL [FILED CONCURRENTLY: [PROPOSED] ORDER]

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(i), the United States of America ("United States") and Relator, hereby, and upon order of the Court, stipulate and agree to the final dismissal of this action against Defendants, subject to the terms of

the Settlement Agreement among the United States, Relator, and Defendants, executed on January 14, 2025. The United States previously intervened against Defendants regarding the Covered Conduct described in Recital Paragraph F of the Settlement Agreement, and declined to intervene as to Relator's other remaining allegations against Defendants.

The dismissal shall be:

(1) with prejudice as to the United States as to all claims against Defendants regarding the Covered Conduct described in Recital Paragraph F of the Settlement Agreement;

(2) without prejudice as to the United States as to all other claims against Defendants; and

(3) with prejudice as to the Relator as to all claims against Defendants.

Except as specifically provided in the Settlement Agreement, each party shall bear its own fees and costs. The Court shall retain jurisdiction to enforce the terms of the Settlement Agreement.

Pursuant to 31 U.S.C. § 3730(b)(1), and in the interests of justice, the Attorney General of the United States, through the undersigned attorney, hereby consents to Relator's dismissal of this action. The United States provides this consent based on its determination that such a dismissal is commensurate with the public interest and that the matter does not warrant the continued expenditure of government resources to pursue or monitor the action based on currently available information.

A [Proposed] Order is filed concurrently herewith.

Respectfully submitted,

DATED: April 16, 2025

COTCHETT, PITRE & MCCARTHY, LLP

/s/ Theresa E. Vitale
THERESA E. VITALE
Attorneys for Relator

DATED: April 16, 2025

YAAKOV M. ROTH
Acting Assistant Attorney General
BILAL A. ESSAYLI
United States Attorney
DAVID M. HARRIS, AUSA
Chief, Civil Division
JAMIE ANN YAVELBERG
COLIN M. HUNTLEY
BENJAMIN C. WEI
Attorneys, Civil Division

/s/ Jack D. Ross
JACK D. ROSS, AUSA
Assistant United States Attorney
Chief, Civil Fraud Section
Attorneys for the United States of America

Attestation

I hereby attest that the other signatory listed, on whose behalf the filing is submitted, concurs in the filing's content and has authorized the filing.

Dated: April 16, 2025

/s/ Jack D. Ross
JACK D. ROSS
Assistant United States Attorney
Chief, Civil Fraud Section
Attorneys for the United States of America