IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

UNITED STATES OF AMERICA *ex rel.* GNGH2, Inc.,	)	
Plaintiffs/Relator,	)	CASE NO.: 3:25-cv-200
v.	)	
DYNAMIC STAFFING IN VIRGINIA, INC.,	)	
Defendant.	)	

JOINT STIPULATION OF DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a), the United States, having intervened in part for purposes of settlement in this *qui tam* action brought pursuant to the False Claims Act, 31 U.S.C. §§ 3729-3733 ("FCA"), and Relator GNGH2, Inc., ("Relator"), hereby notify the Court of the voluntary dismissal of this action as set forth below:

1. Relator dismisses with prejudice all claims alleged in its Complaint as to itself and against the Defendant named in the Complaint.

2. The United States dismisses with prejudice all claims against the Defendant for the "Covered Conduct," as that term is defined in the Settlement Agreement, and dismisses without prejudice claims against the Defendant for all other conduct alleged in the Complaint.

3. Except as provided in the Settlement Agreement, the parties shall bear their respective costs, including any possible attorneys' fees or other expenses of litigation.

4. No Defendant has filed an answer or responsive pleading to the Complaint.

5. Pursuant to the Settlement and *Kokkonen v. Guardian Life Insurance Co. of America*, 511 U.S. 375 (1994), the Court shall retain jurisdiction to enforce the terms of the Settlement Agreement.

Dated: November 4, 2025.

LINDSEY HALLIGAN
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By: /s/

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