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FILED
CLERK, U.S. DISTRICT COURT
August 8, 2024
CENTRAL DISTRICT OF CALIFORNIA
BY: DBE DEPUTY

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

UNITED STATES OF AMERICA *ex rel*. **[UNDER SEAL]**,
Plaintiffs,
v.
[UNDER SEAL],
Defendants.

No. CV 21-06279 MEMF (PDx)

THE UNITED STATES OF AMERICA'S NOTICE OF ELECTION RE: INTERVENTION AND JOINT STIPULATION RE: UNSEALING OF CASE

[FILED UNDER SEAL PURSUANT TO THE FALSE CLAIMS ACT, 31 U.S.C. §§ 3730(b)(2) AND (3)]

[LODGED CONCURRENTLY UNDER SEAL: [PROPOSED] ORDER RE: UNSEALING OF CASE]

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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

UNITED STATES OF AMERICA *ex rel*. LIBERTY LAW OFFICE, INC.,
Plaintiffs,
v.
THE BLOOM FIRM; LISA BLOOM; AND BRADEN POLLOCK,
Defendants.

No. CV 21-06279 MEMF (PDx)

THE UNITED STATES OF AMERICA'S NOTICE OF ELECTION RE: INTERVENTION AND JOINT STIPULATION RE: UNSEALING OF CASE

[FILED UNDER SEAL PURSUANT TO THE FALSE CLAIMS ACT, 31 U.S.C. §§ 3730(b)(2) AND (3)]

[LODGED CONCURRENTLY UNDER SEAL: [PROPOSED] ORDER RE: UNSEALING OF CASE]

THE UNITED STATES OF AMERICA'S NOTICE OF ELECTION RE: INTERVENTION

Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(4)(A), plaintiff the United States of America ("the United States"), notifies the Court of its election to intervene in this action for settlement purposes against Defendants The Bloom Firm, Lisa Bloom, and Braden Pollock (collectively, "Defendants"). The United States, Defendants, and *qui tam* plaintiff Liberty Law Office, Inc. ("Relator") entered into a settlement agreement on or about August 2, 2024 (the "Settlement Agreement").

Further, the United States has completed its investigation and made its election; thus, there is no further need for the seal. *See*, *e.g.*, 31 U.S.C. § 3730(b)(3) & (4). Accordingly, the United States and Relator have entered the Joint Stipulation Re: Unsealing of Case below, which requests that this case be unsealed and that certain documents filed be unsealed.

JOINT STIPULATION RE: UNSEALING OF CASE

IT IS HEREBY STIPULATED AND AGREED by and among the United States and Relator, through their respective attorneys of record and subject to the approval of the Court, that this action and its documents should be unsealed as follows:

1. The seal should be lifted from this action in all respects, except as specified in Paragraph 5 below;
2. Relator's Complaint should be unsealed;
3. The United States' Notice of Election Re: Intervention and Joint Stipulation Re: Unsealing of Case should be unsealed; and
4. Any Order in which the Court unseals this action should be unsealed.
5. The United States and Relator further stipulate that all other papers filed or lodged to date in this action should remain permanently under seal because such papers were provided by law to the Court alone for the sole purpose of discussing the content and extent of the United States' investigation and ensuing settlement discussions, and, thereby, evaluating whether the seal

and time for making an election to intervene should be extended. 31 U.S.C. § 3730(b)(3) (providing that government's motions for extension of time may be made *in camera*).

A proposed Order accompanies this request.

Dated: August 6, 2024

Respectfully submitted,

E. MARTIN ESTRADA
United States Attorney
DAVID M. HARRIS
Assistant United States Attorney
Chief, Civil Division
ROSS M. CUFF
Assistant United States Attorney
Chief, Civil Fraud Section

/s/ Aaron Kollitz
AARON KOLLITZ
Assistant United States Attorney

Attorneys for the
United States of America

Dated: August 6, 2024

LIBERTY LAW OFFICE, INC.

/s/ Micha Liberty*

Attorneys for the Relator Liberty Law Office, Inc.

*The signatory listed, and on whose behalf this filing is submitted, concurs in the filing's content and has authorized the filing.

PROOF OF SERVICE ELECTRONIC MAIL

I am over the age of 18 and not a party to the within action. I am employed by the Office of United States Attorney, Central District of California. My business address is 300 North Los Angeles Street, Suite 7516, Los Angeles, California 90012.

On August 8, 2024, I e-mailed a copy of **THE UNITED STATES OF AMERICA'S NOTICE OF ELECTION RE: INTERVENTION AND JOINT STIPULATION RE: UNSEALING OF CASE**

To: Michal Liberty

Email: micha@libertylaw.com

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on August 8, 2024 at Los Angeles, California.

CONNIE HOM