IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES *ex rel.* KAREN BLOOMFIELD, *Plaintiff-Relator*, v. ENGINEERED STRUCTURES, INC., *Defendant*.	Civil Action No. 1:22-cv-00789-DJN-IDD

NOTICE OF SETTLEMENT

The Parties in this litigation have reached an agreement for settlement of this case, subject to approval from the U.S. Attorney. They are finalizing the agreed-upon steps in the settlement process and expect to complete it in the very near future. Plaintiff respectfully requests, therefore, that the Court stay and take no action in this case prior to November 4, 2025, to give the Parties time to finalize the Settlement and complete the final requirements of the Settlement Agreement.

Dated: October 20, 2025

Respectfully submitted,

/s/ Glenn Chappell
Glenn Chappell, VA Bar No. 92153
2000 Pennsylvania Ave., NW, Suite 1010
Washington, DC 20006
Telephone: (510) 588-5299
Facsimile: (202) 973-0950
Email: gchappell@tzlegal.com

James E. Miller
Miller Shah LLP
65 Main Street
Chester, CT 06412

Telephone: (866) 540-5505
Facsimile: (866) 300-7367
Email: jemiller@millershah.com

Bruce D. Parke
Alec J. Berin
Miller Shah LLP
1845 Walnut Street, Suite 806
Philadelphia, PA 19103
Telephone: (866) 540-5505
Facsimile: (866) 300-7367
Email: bdparke@millershah.com
ajberin@millershah.com

Anna K. D'Agostino
Madison A. Gregg
Miller Shah LLP
225 Broadway, Suite 1830
New York, NY 10007
Telephone: (866) 540-5505
Facsimile: (866) 300-7367
Email: akdagostino@millershah.com
magregg@millershah.com

Rachel V. Rose – Attorney at Law, PLLC
P.O. Box 22718
Houston, Texas 77227
Telephone: (713) 907-7442
Email: rvrose@rvrose.com

Attorneys for Relator

/s/ Jason M. Crawford
Jason M. Crawford, VA Bar No. 83781
Amy Laderberg O'Sullivan, VA Bar No. 44267
Agustin D. Orozco (admitted *pro hac vice*)
Jessica Longoria (admitted *pro hac vice*)
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: (202) 624-2500
Facsimile: (202) 628-5116
JCrawford@crowell.com
AOSullivan@crowell.com

AOrozco@crowell.com
JLongoria@crowell.com

Attorneys for Engineered Structures Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send electronic filing to all counsel of record.

/s/ Jason M. Crawford
Jason M. Crawford, VA Bar No. 83781
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: (202) 624-2500
Facsimile: (202) 628-5116
JCrawford@crowell.com

Attorney for Engineered Structures Inc.