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

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

STIPULATION AND [PROPOSED] ORDER OF DISMISSAL

Plaintiff-Relator, Karen E. Bloomfield ("Relator), and Defendant, Engineered Structures, Inc. ("Defendant" or "ESI"), by and through their respective counsel, hereby respectfully notify the Court that the United States of America (the "United States"), the Relator and the Defendant have entered into a settlement agreement (hereinafter the "Settlement Agreement") that resolves all claims brought pursuant to the False Claims Act ("FCA"), 31 U.S.C. § 3730 *et seq.* The Settlement Agreement requires Defendant to make an agreed-upon payment to the United States and a separate agreement (the "Side Agreement") requires Defendant to make an agreed-upon payment to Relator's counsel to satisfy claims for attorneys' fees and expenses under 31 U.S.C. § 3730(d).[1]

[1] As the parties have reached agreement regarding all material terms, including the amount of attorneys' fees and expenses to be paid by Defendant, the United States, Relator and Defendant respectfully submit that the proposed Order attached as Exhibit "A" can be entered by the Court and the hearing scheduled for November 17, 2025 can be taken off calendar at this time.

Pursuant to 31 U.S.C. § 3730(b)(1), Federal Rule of Civil Procedure 41(a), and the terms and conditions of the parties' Settlement Agreement, Relator and Defendant hereby stipulate, consent and agree to the entry of an order providing as follows:

1. As to the Relator, all claims are dismissed with prejudice; and
2. As to the United States, the claims are dismissed with prejudice as to the Covered Conduct, as defined in Recital C of the Settlement Agreement, and otherwise without prejudice.

Relator, Defendant and the United States have agreed that the Court shall specifically retain and reserve jurisdiction to enforce the terms of the Settlement Agreement and Side Agreement. *See Kokkonen v. Guardian Life Ins. Co. of America*, 511 U.S. 375 (1994).

The United States hereby consents to dismissal as described herein since it has determined that all terms of the parties' resolution are fair and reasonable, and has authorized the filing of this Stipulation.

A proposed Order that the parties respectfully request be entered by the Court is attached as Exhibit "A."

Dated: November 7, 2025

Respectfully submitted,

/s/ Glenn Chappell

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CERTIFICATE OF SERVICE

I hereby certify that on November 7, 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/ Glenn Chappell
Glenn Chappell