

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA
ex rel. TZAC, INC.,

Plaintiff,

v.

MIDDLE EAST INSTITUTE,

Defendant.

Civil Action No. 21-3405 (JDB)

JOINT STIPULATION OF DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a), the United States, having intervened for purposes of settlement in this *qui tam* brought pursuant to the False Claims Act (“FCA”), 31 U.S.C. §§ 3729-3733, and Relator TZAC, Inc. (“Relator”), hereby notify the Court that pursuant to the terms of the Settlement Agreement entered into by the parties in the above-captioned Civil Action, the United States and Relator stipulate to dismissal of the intervened and settled claims, as set forth below:

1. All of the intervened and settled claims described as “Covered Conduct” in the Settlement Agreement, are dismissed with prejudice as to the United States and Relator.
2. All other claims in the Civil Action, to the extent any claims remain, shall be dismissed without prejudice as to the United States.
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 with respect to the intervened and settled claims.

4. Defendant has not been served or filed an answer or responsive pleading to the Relator's *qui tam* Complaint.

A proposed order of dismissal is submitted herewith.

May 1, 2024

Respectfully submitted,

MATTHEW M. GRAVES, D.C. Bar #481052
United States Attorney

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Chief, Civil Division

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