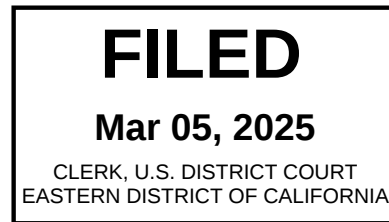


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Attorneys for the United States



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES *ex rel.*, GNGH2 INC.,
Plaintiff/Relator,
v.
CARSON TAHOE PHYSICIAN CLINICS,
Defendants.

CASE NO. 2:23-CV-1361 KJM CKD

JOINT STIPULATION OF VOLUNTARY
DISMISSAL BY THE UNITED STATES AND
RELATOR

Pursuant to Federal Rule of Civil Procedure 41(a), the United States of America and Relator GNGH2, Inc. ("Relator"), hereby stipulate that the above-captioned action shall be dismissed pursuant to the terms of the Settlement Agreement between the United States, Relator, and Carson Tahoe Physician Clinics, Carson Tahoe Health System, and Carson Tahoe Continuing Care Hospital dated January 23, 2025.

The United States and Relator stipulate to the entry of the attached Proposed Order dismissing the False Claims Act claims asserted in this action on behalf of the United States. The dismissal shall be with prejudice as to the Relator and without prejudice to the United States.

Notwithstanding the entry of a dismissal herein, the Parties agree that the United States District Court for the Eastern District of California shall retain jurisdiction to enforce the terms of the Settlement Agreement, if necessary, and that this Court shall be the sole venue for any dispute arising thereunder.

The United States requests that Relator's Complaint, this Stipulation, and the attached proposed

STIPULATION OF DISMISSAL

1 Order be unsealed. The United States requests that all other papers on file in this action remain under
2 seal because in discussing the content and extent of the United States' investigation, such papers are
3 provided by law to the Court alone for the sole purpose of evaluating whether the seal and time for
4 making an election to intervene should be extended. Relator does not oppose this request.

5 A proposed order accompanies this stipulation.

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7 Respectfully submitted,

8 Dated: March 5, 2025

MICHELE BECKWITH
Acting United States Attorney

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10 By: /s/ Tara A. Amin
11 TARA A. AMIN
Assistant United States Attorney

12
13 Dated: March 5, 2025

COUNSEL FOR RELATOR
GNGH2, INC.

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15 By: /s/ Yael Lerman
16 YAEL LERMAN
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1 USA *ex rel.* GNGH2 Inc. v. Carson Tahoe Physician Clinics
2:23-cv-01361-KJM-CKD

3 **CERTIFICATE OF SERVICE BY ELECTRONIC MAIL AND U.S. MAIL**

4 The undersigned hereby certifies that he is an employee in the Office of the United States
5 Attorney for the Eastern District of California and is a person of such age and discretion to be competent
6 to serve papers;

7 That on March 5, 2025, he served a copy of:

8 JOINT STIPULATION OF VOLUNTARY DISMISSAL BY THE UNITED STATES AND
9 RELATOR

10 [PROPOSED] ORDER ON THE JOINT STIPULATION OF VOLUNTARY DISMISSAL BY THE
UNITED STATES AND RELATOR

11 by transmitting true and correct copies thereof from Isaac.Shu@usdoj.gov to the electronic mail address
12 listed, and

13 by placing a true and correct copy thereof in a postage paid, sealed envelope, addressed as stated below, which
14 are the last known address of the party being served, and placed said envelope in the United States mail, at
15 Sacramento, California.

16 **ADDRESSEE(S):**

17 Yael Lerman, Esq.
ylmazar@gmail.com
18 6505 Wilshire Boulevard
Los Angeles, CA 90048

19 Attorney for Relator GNGH2 Inc.
20

21
22 /s/ Isaac Shu
ISAAC SHU