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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA *ex rel.*
VERITY INVESTIGATIONS, LLC,

Plaintiffs,

v.

LYNRED USA INC.,

Defendant.

HON. BRIAN R. MARTINOTTI

Civil Action No. 25-16211

JOINT STIPULATION OF DISMISSAL

WHEREAS on or about October 2, 2025, Relator Verity Investigations, LLC (“Relator”), through counsel, filed a complaint in this action on behalf of the United States pursuant to the *qui tam* provisions of the False Claims Act, 31 U.S.C. § 3730(b);

WHEREAS the United States investigated Relator’s allegations, reached a resolution with Defendant Lynred USA Inc., and filed a notice of intervention in this action for the purposes of effectuating a settlement agreement among the parties;

WHEREAS, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure and the *qui tam* provisions of the False Claims Act, 31 U.S.C. § 3730(b)(1), and in accordance with the terms of the Settlement Agreement, the United States and Relator hereby STIPULATE and AGREE as follows:

1. The United States, Relator, and Defendant have executed a written Settlement Agreement that provides for the dismissal of this action in its entirety.

2. Relator stipulates and agrees that the settlement of this action is fair, adequate, and reasonable under all the circumstances as defined by 31 U.S.C. § 3730(c)(2)(B).

3. The United States and Relator request that, consistent with the terms and conditions of the Settlement Agreement and pursuant to Rule 41(a) of the Federal Rules of Civil Procedure and the False Claims Act, 31 U.S.C. § 3730(b)(1), this action be dismissed as follows:

a. With prejudice to Relator as to all claims on behalf of the United States as against the Defendant;

b. With prejudice to the United States as to the Defendant and the “Covered Conduct,” as defined by the Settlement Agreement and set forth in the United States’ Notice of Election to Intervene for Purposes of Effectuating Settlement (filed with the Court on or about February 27, 2026); and

c. Without prejudice as to the United States’ claims and

parties that are not within the “Covered Conduct” and that are not related to the Defendant.

4. No answer by the Defendant has been served or filed, and no parties other than the United States and the Relator have appeared in this Action.

Dated: Newark, New Jersey
May 7, 2026

ROBERT FRAZER
United States Attorney

By: /s/ David V. Simunovich
David V. Simunovich
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970 Broad Street, Suite 700
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Counsel for the United States

/s/ Steven M. Shepard
Steven M. Shepard, Esq.
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One Manhattan West, 50th Floor
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Counsel for Relator

CERTIFICATE OF SERVICE

I, Assistant U.S. Attorney David V. Simunovich, hereby certify that on May 7, 2026, I caused a copy Joint Stipulation of Dismissal to be filed with the Court, and served on relator, via ECF. I swear that the foregoing statements are true and correct to the best of my knowledge. I am aware that I am subject to penalty for any willful misstatement herein.

Dated: Newark, New Jersey
May 7, 2026

/s/ David V. Simunovich
DAVID V. SIMUNOVICH
Assistant United States Attorney