

The Honorable Kymberly K. Evanson

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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA, *ex rel.*  
KUSHWINDER SINGH,

Plaintiff,

v.

ALEDADE, INC., *et. al.*,

Defendants.

CASE NO. 2:21-cv-0410-KKE

**STIPULATION OF VOLUNTARY  
DISMISSAL OF COUNTS I-IV IN THE  
FIRST AMENDED COMPLAINT AND  
[PROPOSED] ORDER**

**NOTE ON MOTION CALENDAR:  
August 2, 2024**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), **IT IS HEREBY STIPULATED** by and between Plaintiff Kushwinder Singh (“Relator Singh”), Defendant Aledade, Inc. (“Aledade”), and the United States of America, through their counsel of record, that the False Claims Act causes of action, Counts I, II, III, and IV of the First Amended Complaint (“the FCA Counts”), are dismissed against all defendants, and the non-Aledade defendants are dismissed, with prejudice as to Relator Singh but without prejudice as to the United States. Relator Singh has filed a Second Amended Complaint as stipulated by the parties and ordered by the Court in Docket No. 41. All Parties will bear their own costs and attorneys’ fees. Pursuant to 31 U.S.C. § 3730(b)(1), the United States provides its written consent to the dismissal of the FCA Counts, without prejudice to the United States. The parties respectfully request that the Court enter the order below pursuant to section 3730(b)(1).

1 RESPECTFULLY SUBMITTED this 2nd day of August, 2024. I certify that this  
2 document contains 155 words, in compliance with the Local Civil Rules.

3 TELLER LAW

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ORDER OF DISMISSAL

Pursuant to the above stipulation of the parties, the Court hereby **ORDERS** that the False Claims Act causes of action, Counts I, II, III, and IV of the First Amended Complaint, are dismissed against all defendants, with prejudice as to Relator Kushwinder Singh but without prejudice as to the United States. Relator Singh and the United States have indicated by their stipulation that they do not wish to pursue these claims, and the Court finds that it is in the interests of justice to consent to dismissal.

IT IS SO ORDERED this \_\_\_\_ day of August, 2024.

\_\_\_\_\_  
Judge Kymberly K. Evanson  
United States District Judge