1 The Honorable Kymberly K. Evanson 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE 9 UNITED STATES OF AMERICA, ex rel. CASE NO. 2:21-cv-0410-KKE 10 KUSHWINDER SINGH, STIPULATION OF VOLUNTARY 11 Plaintiff, DISMISSAL OF COUNTS I-IV IN THE FIRST AMENDED COMPLAINT AND 12 v. **ORDER** 13 ALEDADE, INC., et. al., NOTE ON MOTION CALENDAR: August 2, 2024 14 Defendants. 15 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), IT IS HEREBY 16 STIPULATED by and between Plaintiff Kushwinder Singh ("Relator Singh"), Defendant 17 18 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 19 ("the FCA Counts"), are dismissed against all defendants, and the non-Aledade defendants are 20 dismissed, with prejudice as to Relator Singh but without prejudice as to the United States. Relator 21 Singh has filed a Second Amended Complaint as stipulated by the parties and ordered by the Court 22 in Docket No. 41. All Parties will bear their own costs and attorneys' fees. Pursuant to 31 U.S.C. 23 § 3730(b)(1), the United States provides its written consent to the dismissal of the FCA Counts, 24 without prejudice to the United States. The parties respectfully request that the Court enter the 25 order below pursuant to section 3730(b)(1). 26 27 STIPULATION AND ORDER OF

STIPULATION AND ORDER OF PARTIAL DISMISSAL - 1 (No. 2:21-cv-0410-KKE)

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	CORR CRONIN LLP
4	s/Stephen Teller (via email approval)	s/ Jeffrey B. Coopersmith
5	Stephen Teller, WSBA No. 23372 300 Lenora Street, Suite 1471	Jeffrey B. Coopersmith, WSBA No. 30954 1015 Second Avenue, Floor 10
6	Seattle, WA 98121 Ph: (206) 324-8969	Seattle, WA 98104-1001 Ph: (206) 625-8600
7	steve@stellerlaw.com	jcoopersmith@correronin.com
8	Seth Rosenberg, WSBA No. 47474 Joseph D. Gehrke, WSBA No. 41660	Brian P. Dunphy ( <i>Pro Hac Vice</i> ) Nicole E. Henry ( <i>Pro Hac Vice</i> )
9	THE SEATTLE LITIGATION GROUP, PLLC	MINTZ, LEVIN, COHN, FERRIS, GLOVSKY AND POPEO, P.C.
10	1215 4th Avenue, Suite 1100 Seattle, WA 98161	One Financial Center Boston, MA 02111
11	Ph: (206) 407-3300 seth@seattlelitigation.com	Ph: (617) 542-6000 BDunphy@mintz.com
12	joe@seattlelitigation.com	NEHenry@mintz.com
13	Attorneys for Plaintiff Kushwinder Singh	Karen S. Lovitch ( <i>Pro Hac Vice</i> ) MINTZ, LEVIN, COHN, FERRIS, GLOVSKY
14		AND POPEO, P.C. 555 12th Street NW, Suite 1100
15		Washington, DC 20004 Ph: (202) 434-7300
16		kslovitch@mintz.com
17 18	BRAIN BOYNTON Principal Deputy Assistant Attorney General	Attorneys for Defendant Aledade, Inc.
	TESSA M. GORMAN	
19	United States Attorney	
20	s/ Kayla C. Stahman (via email approval) Kayla C. Stahman, CA #228931	
21   22	Matt Waldrop, Georgia Bar #349571 Assistant United States Attorney	
	United States Attorney's Office 700 Stewart Street, Suite 5220	
23	Seattle, Washington 98101-1271 Ph: (206) 553-7970	
24 25	kayla.stahman@usdoj.gov james.waldrop@usdoj.gov	
	Attorneys for the United States of America	
26 27		
41	STIPULATION AND ORDER OF PARTIAL DISMISSAL - 2	Corr Cronin, LLP

(No. 2:21-cv-0410-KKE)

Corr Cronin, LLP 1015 Second Avenue, Floor 10 Seattle, WA 98104-1001 (206) 625-8600

## 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 13th day of August, 2024.

Lymberly X Eanson

Kymberly K. Evanson United States District Judge

STIPULATION AND ORDER OF PARTIAL DISMISSAL - 3 (No. 2:21-cv-0410-KKE)