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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES ex rel. BRENT STANLEY)	Case No. 2:11-CV-3260 GEB DAD
and PATRICK McKILLOP, and STATE OF)	
CALIFORNIA et al., ex rel. BRENT)	
STANLEY and PATRICK McKILLOP,)	[PROPOSED] ORDER DISMISSING THE
)	CLAIMS OF THE STATE OF
Plaintiffs-Relators,)	CALIFORNIA
)	
vs.)	
)	
IRON MOUNTAIN, INC. and IRON)	
MOUNTAIN INFORMATION)	
MANAGEMENT, INC.,)	
)	
Defendants.)	

Pursuant to Federal Rule of Civil Procedure 41(a) and the California Government Code § 12652(c)(1), the State of California (excluding any political subdivisions of the State and the University of California, as defined by the California Government Code §§ 12650, et seq.), Relators Brent Stanley and Patrick McKillop, and Defendant Iron Mountain Incorporated and Iron Mountain Information Management, LLC¹ (together, “Iron Mountain”) (collectively, the “Parties”) have filed

¹ Iron Mountain Information Management, LLC is the successor to Iron Mountain Information Management, Inc.

1 a Joint Stipulation of Dismissal in accordance with the terms of a settlement agreement
2 (“Agreement”) entered into among the Parties effective as of December 17, 2014.

3 Upon consideration of the Joint Stipulation, it is hereby ORDERED that:

4 1. All claims asserted in this action against Iron Mountain on behalf of the State of
5 California or any of its political subdivisions are dismissed with prejudice as to Relators, except as
6 otherwise provided in the Agreement.

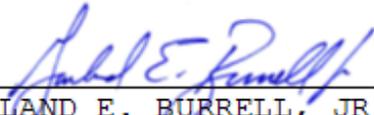
7 2. Except as otherwise provided in the Agreement, all claims in this action for Covered
8 Conduct as defined in the Agreement among the Parties are dismissed with prejudice as to the State
9 of California. All other claims asserted in this action on behalf of the State of California are
10 dismissed without prejudice as to the State of California.

11 3. The State of California and Iron Mountain shall bear their own costs related to the
12 claims asserted in this action on behalf of the State of California.

13 4. The rights of Relators and/or their counsel to seek recovery of reasonable expenses,
14 fees and costs, including attorney’s fees and costs related to this action, are governed by the
15 California False Claims Act, Cal. Gov’t Code, §§ 12650, *et seq.* The Court shall retain jurisdiction
16 over this matter to resolve any dispute that may arise relating to such claims.

17
18 IT IS SO ORDERED.

19 Dated: December 31, 2014

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23 GARIAND E. BURRELL, JR.
24 Senior United States District Judge
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