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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

United States of America and State of
California, *ex rel.* Rebecca Handal, et al.,

Plaintiffs,

vs.

Center For Employment Training,

Defendant.

Case No.: 2:13-cv-1697 KJM KJN

STIPULATION OF DISMISSAL

WHEREAS, this Stipulation of Dismissal (“Stipulation”) is entered into by and among
plaintiffs Rebecca Handal, Dina Dominguez, and Elicia Fernandez (“Relators” or “Plaintiffs”),

and defendant Center for Employment Training (“CET” or “Defendant”), by their respective authorized representatives (collectively, “Parties”); and

WHEREAS, on August 16, 2013, Relators and Christine Stearns (“Stearns”) filed a *qui tam* complaint against CET and various individuals, pursuant to the *qui tam* provisions of the False Claims Act, 31 U.S.C. §§ 3729 *et seq.* (the “FCA”) and the California False Claims Act, Cal. Gov. Code, §§ 12650 *et seq.* (the “CFCA”); and

WHEREAS, on March 26, 2014, Relators and Stearns filed a First Amended Complaint pursuant to the FCA and CFCA as well as individual claims pursuant to Cal. Civ. Code, §§ 1709-1710 and various common law claims; and

WHEREAS, both the United States and the State of California declined to intervene in the FCA and CFCA claims; and

WHEREAS, Stearns has voluntarily withdrawn from the case; and

WHEREAS, on September 12, 2019, the Court entered an Order pursuant to which Christine Stearns was dismissed, with prejudice, from this action in her individual capacity as relator. This dismissal did not constitute dismissal of claims brought by Stearns on behalf of the government; and

WHEREAS, CET denies that there is any factual or legal basis for Relators’ claims; and

WHEREAS, the Parties have reached a mutually-agreeable resolution addressing the claims asserted against CET; and

WHEREAS the United States and the State of California have no objection to the dismissal of the First Amended Complaint with prejudice;

THE PARTIES HEREBY STIPULATE that the First Amended Complaint is dismissed with prejudice.

Respectfully submitted,

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ORDER

THE COURT APPROVES THE PARTIES' STIPULATION with the following clarification: The First Amended Complaint, and all remaining claims not previously dismissed, are hereby dismissed with prejudice, except that the claims Stearns brought on behalf of the government are dismissed without prejudice. *See* ECF 127.

The court accepts the parties stipulation that the agreed resolution comports with the provisions of California Government Code sections 12652(c)(1) and (g)(3).

SO, ORDERED.

DATED: October 1, 2019.


UNITED STATES DISTRICT JUDGE